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|------|-----|--|----------------------------------|---|--------|---|----|--|----|----|------|
| 2011 | PSH | Families In Transition | Lowell Street PHPV | N | SF | 4 | 4 | | | 4 | |
| 2011 | PSH | Families In Transition | Millyard I | C | SFHC | 0 | 28 | | 28 | 28 | 100% |
| 2011 | PSH | Families In Transition | The Family Mill NHHFA | C | HC | 0 | 5 | | 5 | 5 | 100% |
| 2011 | PSH | Families In Transition | The Family Mill PHP I | C | SFHC | 0 | 25 | | 25 | 25 | 100% |
| 2011 | PSH | Families In Transition | The Family Mill PHP II | C | SFHC | 0 | 9 | | 8 | 9 | 89% |
| 2011 | PSH | Harbor Homes, Inc. | Somerville St PSH | U | SMF | 6 | 6 | | 0 | 6 | |
| 2011 | PSH | Helping Hands Outreach Ministries | Gendron House PHP II | C | SM | 0 | 12 | | 7 | 12 | 58% |
| 2011 | PSH | Manchester Housing Redevelopment Authority | Brown School Apartments | C | SMF | 0 | 7 | | 7 | 7 | 100% |
| 2011 | PSH | Manchester Housing Redevelopment Authority | Mary Gale Apartments | C | SMF | 0 | 8 | | 8 | 8 | 100% |
| 2011 | PSH | Southern New Hampshire Services | Robinson House | C | SM | 0 | 24 | | 24 | 24 | 100% |
| 2011 | PSH | The Way Home | 224 Spruce Street | N | SMF+HC | 0 | 18 | | 18 | 18 | 100% |
| 2011 | PSH | The Way Home | Your Way Home I | C | SMF | 5 | 5 | | 5 | 5 | 100% |
| 2011 | PSH | The Way Home | Your Way Home III | C | SMF | 4 | 4 | | 4 | 4 | 100% |
| 2011 | PSH | VA Medical Center | VASH Vouchers | N | SMF+HC | 0 | 80 | | 80 | 80 | 100% |
| 2011 | SH | Helping Hands Outreach Ministries | Gendron House-Safe Haven | C | SM | | 2 | | 2 | 2 | 100% |
| 2011 | SH | Helping Hands Outreach Ministries | HCHV - Safe Haven | N | SM | | 2 | | 2 | 2 | 100% |
| 2011 | TH | Child and Family Services | Transitional Living Program | C | SMF+HC | | 19 | | 12 | 19 | 63% |
| 2011 | TH | Families In Transition | Amherst Street | C | SF | | 9 | | 9 | 9 | 100% |
| 2011 | TH | Families In Transition | Family Willows Transitional | C | HC | | 26 | | 26 | 26 | 100% |
| 2011 | TH | Families In Transition | Manchester Community Program | N | SFHC | | 18 | | 13 | 18 | 72% |
| 2011 | TH | Families In Transition | Millyard II | C | SFHC | | 37 | | 37 | 37 | 100% |
| 2011 | TH | Families In Transition | Spruce Street | C | HC | | 14 | | 14 | 14 | 100% |
| 2011 | TH | Harbor Homes, Inc. | Veterans FIRST Somerville Street | U | SMF+HC | | 20 | | 0 | 20 | |
| 2011 | TH | Helping Hands Outreach Ministries | HCHV - HHOC | N | SM | | 5 | | 5 | 5 | 100% |
| 2011 | TH | Helping Hands Outreach Ministries | HHOC* | C | SM | | 18 | | 11 | 18 | 61% |
| 2011 | TH | Liberty House | Transitional Program | C | SMF | | 10 | | 10 | 10 | 100% |
| 2011 | TH | The Way Home | 214 Spruce Street | C | HC | | 21 | | 21 | 21 | 100% |

Homeless Prevention & Rapid Re-housing Program

The City of Manchester was awarded \$766,545.00 in this ARRA program. Homeless Prevention & Rapid Re-housing services including financial assistance are ongoing. This funding has made it possible for 78 homeless individuals (33 households) to secure housing. In addition, 174 people (84 households) have been assisted that were at imminent risk of homelessness. Supportive services are ongoing with all clients to assure housing stability. This program will be complete by June 2012. With the exhaustion of those funds and pending public input and approval by Manchester's Board of Mayor and Alderman, the City plans to continue rapid rehousing and homeless prevention activities through ESGP funding as provided for and allowable by the HEARTH Act and through HOME funds.

MCoC Membership:

1269 Elm Cafe, 2-1-1-NH, Angie's Shelter for Women, Board of Mayor and Aldermen, Bob T., Catholic Medical Center, Child and Family Services, Child Health Services, Child Health Services Teen Health Clinic, Citizen's Bank, City of Manchester - Community Improvement Program, City of Manchester - Mayor's Office, Community Services Council of New Hampshire, Cyndi Carlson, Dianne Pitts, Easter Seals, Elliot Hospital, Families in Transition, Family Outfitters, Farnum Center, Granite Pathways, Granite State Organizing Project, Granite United Way, Graphic Details, Greater Manchester Association of Service Agencies, Greater Manchester Chamber of Commerce, Harbor Homes, Helping Hands, Housing Action NH, Housing Forum, Joe Q., Liberty House, Manchester Christian Church, Manchester Community Resource Center, Manchester Continuum of Care Homeless Services Center, Manchester Emergency Housing, Manchester Health Department, Manchester Housing & Redevelopment Authority, Manchester Office of Youth Services, Manchester Police Department, Manchester School Department, Manchester Welfare Department, Mental Health Center of Greater Manchester, Mobile Community Health Team/Healthcare for the Homeless, Moore Center Services, More than Wheels, Musicians for a Cause, New Hampshire Catholic Charities, New Hampshire Charitable Foundation - Manchester Region, New Hampshire Coalition to End Homelessness, New Hampshire Community Loan Fund, New Hampshire Department of Corrections, New Hampshire Department of Education, New Hampshire Department of Health and Human Services, New Hampshire Food Bank, New Hampshire Healthy Kids, New Hampshire Legal Assistance, New Hampshire Pro Bono, New Horizons for NH, NH Division for Children, Youth, and Families, NH Office of Homelessness, Housing, and Transportation Services, On the Road to Recovery, Pam Brown, Sacred Heart Church, Serenity Place, Southern New Hampshire Services, St. Anne/St. Augustine, St. Joseph Cathedral, The Salvation Army, The Way Home, Tirrell House, Transportation Services, U.S. Department of Housing and Urban Development - Manchester Field Office, Under the Bridge Project, University of New Hampshire, V.A. Medical Center, Various Local Churches/Faith Communities, Veteran Administration, Veterans Center, YWCA Women's Crisis Center.

Child and Family Services - Runaway Homeless Youth - \$13,400
Granite United Way - Homeless Services Director - \$11,000 (ESGP), \$19,000 (AHT)
Granite United Way - Manchester COC Homeless Services Center - \$15,000 (AHT)
Helping Hands Outreach Center - Transitional Shelter - \$10,000 (ESGP)
New Horizons for New Hampshire - Shelter Operational Expenses - \$35,000 (ESGP)
New Horizons for New Hampshire - Essential Services - \$12,500 (ESGP)
New Horizons for New Hampshire - Capital Improvements - \$10,000
Manchester Emergency Housing Operational - \$10,000 (ESGP)
YWCA - Emily's Place Operations - \$7,500 (ESGP)

The Way Home - Innovative Homeless Prevention/Intervention - \$43,292 (ESGP)
The Way Home - Tenant Based Assistance - \$50,000 (HOME)
Planning and Community development - HMIS Training/Program Support - \$7,000 (ESGP)
Child Health Services - Pediatric Clinic 65,000 (CDBG)
Easter Seals - Child Care and Family Resource Center - \$30,000 (CDBG)
Health Department - Homeless Healthcare - \$488,361 (Federal)
MHRA Youth Education and Enrichment Program - \$18,500 (CDBG)
Girls Inc. - Girls Center Operations - \$10,800 (CDBG)
Girls Inc. - Café Lauren - \$5,000 (CDBG)

YMCA – Y-Start Program - \$56,000
(CDBG)

Court Appointed Special Advocates –
Abused and Neglected Children Support -
\$13,000 (CDBG)

AFFORDABLE HOUSING STRATEGY

Due to the poor economy, the construction of new workforce - elderly assisted living - permanent supportive housing units (485 HUD funded units constructed between 2005 and 2012) and high vacancy rates, rents have stabilized in the City. According to the 2010 New Hampshire Housing Finance Authority Survey, the average rent for a two-bedroom apartment in Manchester has increased 175% since 1995 from \$573/month to \$1,003/month. Affordable housing continues to be a challenge for those families in Manchester that are earning less than 80% of the median income. The Estimates of Affordability included in the 2011 NHHFA Rental Survey concluded that only 25.9% of the two bedroom units surveyed in Hillsborough County would be affordable to a 3-person household earning 50% of the median income. The household income required to afford the average monthly rent for a two-bedroom apartment in Manchester would be \$40,100/year. Households with incomes at 50% of the median are earning \$38,500/year. An affordable rent for a family of three earning 50% of the median income would be \$962/month. It becomes even more problematic for very low-income families (households earning 30% of the median income). An affordable rent for a family of three earning 30% of the median income (\$23,100) would be \$577/month. Remember the average rent for a two-bedroom apartment in Manchester is \$1,003/month. Affordable housing continues to be a challenge for those families in Manchester that are earning less than 80% of the median income.

Although rents have stabilized in the City, the availability of work force housing continues to be a problem for very low and low -income families in Manchester. NeighborWorks Greater Manchester (NGM) and the Manchester Housing and Redevelopment Authority (MHRA) both maintain extensive waiting lists (NGM - 150 families, MHRA - 11,128 families) for available affordable housing units. The waiting period for affordable apartments may be as long as three years. The vacancy rates for these two organizations range from 2% (NGM) to 3.3% (MHRA). The extensive waiting lists of these two agencies indicate a significant demand for housing that is affordable in accordance with HUD standards. As has been reported in previous Action Plans and CAPERs, the City continues to produce affordable housing on an annual basis in an effort to meet the needs of low-income families. In addition to the production of units, the City continues to work on the implementation of its Action Strategy for Housing to increase the number of affordable housing units in Manchester. With reference to the development of additional units, vacant land has not been readily available to construct new housing units. As such, the City has focused on the rehabilitation of existing properties and the revitalization of distressed real estate (West Granite Gateway Project, The Way Home 85-87 Laurel Street Veterans Housing Project and Neighborhood Stabilization Program III activities). In an effort to maximize the supply of affordable housing in Manchester and maintain healthy vacancy rates in low-income neighborhoods, the City will emphasize the development of housing in the Neighborhood Revitalization Strategy Area in conjunction with the Neighborhood Stabilization Program III.

To meet the needs of the low-income and the very low-income during the 2012 Action Plan Period, the City will develop workforce, veteran's and supportive housing units, bring existing housing units into compliance with minimum housing codes and provide security deposits and rental subsidies.

Development of Workforce Housing – It is anticipated that approximately \$486,166 of Entitlement funds (HOME) will be used over the next Action Plan period to develop a minimum of 15 units of rental housing. Both low and moderate income households will benefit as a result.

Tenant Based Rental Assistance – It is anticipated that approximately \$50,000 of Entitlement funds (HOME) will be used over the Action Plan period to provide assistance to a minimum of 160 Very low and low-income households.

Home Ownership

Due to the poor economy, increasing utility costs and the increasing number of foreclosures, the City has decided to place a moratorium on its home ownership activities.

Supportive Housing

Due to the housing needs associated with the aging population, the Manchester Housing and Redevelopment Authority (MHRA) has been using City HOME funding to develop supportive elderly housing since 2004 (The Gale Home, The Brown School and 800 South Porter Street). The supportive services provided with the housing enables frail elderly residents to maintain independence as they “age in place”. Upon completion of 800 South Porter Street Phase II (June 2010), MHRA will have successfully completed 131 units of supportive housing for Manchester’s elderly. According to information cited in the market study that was completed for the 800 South Porter Street project, it is estimated that the number of persons aged 62 years or more will increase 7.7% during the period between 2008 and 2013. 2000 Census data confirmed that 74.4% of the population aged 65+ years had a disability (Sensory Disability, Physical Disability, Mental Disability, Self-care Disability, Go Outside Home Disability). In addition to elderly supportive housing, the City is working with Harbor Homes and The Way Home to develop supportive housing for homeless veterans.

Development of Supportive Housing – It is anticipated that approximately \$347,176 of Entitlement funds (HOME) will be used over the Action Plan period to develop 3 to 5 units of rental housing. Both very low and low-income households will benefit as a result.

Rehabilitation of the Existing Housing Stock

US Census, 2000 data indicates that 37,180 (73%) of the City’s 50,820 housing units were constructed before 1979. 17,486 (34% of the City’s Housing Stock) of those units were constructed before 1940. To promote the preservation of Manchester’s aging housing stock and the revitalization of existing neighborhoods, the City will continue to emphasize the operation of Housing Rehabilitation, Lead Hazard Control and Energy Efficiency programs. During the past eight years, the City has committed \$926,507 of HOME funds, \$203,000 of CDBG funds, \$250,000 of CDBG-R funds, \$2,975,000 of Lead Hazard Control funds and \$827,000 of Affordable Housing Trust funds to support the City’s Housing Rehabilitation/lead Hazard Remediation.

To meet the needs of the low-income and moderate-income and maintain healthy vacancy rates in the center city, Manchester will continue to provide incentives to encourage property owners to improve their housing units. The following represents the estimated number of

households/individuals to be assisted with HUD funding in FY 2013.

Housing Rehabilitation/Lead Hazard Control Program - It is anticipated that approximately \$250,000 of Entitlement funds (HOME) and \$1,220,000 of Lead Hazard Reduction Demonstration Grant funds will be used over the Action Plan period to provide deferred loans to property owners resulting in the rehabilitation of 87 housing units.

Assignment of Priorities

Housing problems - Overcrowding and physical defects. Portions of this data were obtained from HUD's special tabulations that was part of the 2000 Census, other pieces of information were obtained from housing providers in the City. The information obtained indicates that the greatest incidence of housing problems are experienced by the extremely low and low-income citizens. Large, extremely low and low-income families that rent housing in the City experience the greatest amount of difficulty securing affordable housing followed by extremely low-income owner households. The problems of very low-income renters, especially large families were documented in information obtained from the network of housing and service providers. The City has assigned a high level of need in its Priority Needs Summary Table regarding physical defects for both extremely low-income owners and renter households. In terms of overcrowding, it has been noted by housing providers that a persistent problem in the City continues to be both large and small families that are doubled-up because of the high cost of housing. Although rents have stabilized and vacancy rates have increased (vacancy rates of non profit affordable housing providers range from 3% to 5% while for profit landlords are reporting vacancy rates between 8% to 15%), the average rents in Manchester (3-BR \$1,182, NHHFA 2011 Rental Survey) exceed the affordable rent limits which have been designated by HUD for very low-income families (3-BR \$1,001 HUD Rent Limits 12/2011). Rents for 3-BR apartments ranging from \$592 to \$2,465 are well beyond the means of Manchester families with little or no income. The City views the problem of overcrowding as a high priority need. Regarding physical defects of the middle income households between 51% and 80% of the median. For this income category, the incidence of physical defects experienced by renter households is viewed therefore as a medium priority need. US Census 2010 Data indicates 73% of the City's housing stock was constructed prior to 1979. It is important to note that 50% of the City's housing stock is renter occupied.

Cost Burdens

As was previously noted, the City's analysis of housing cost burdens indicates that the extremely low-income households regardless of size or the length of time they have resided in the City continue to expend the greatest proportion of their income for housing costs. Extremely low-income large rental households and small rental households have the greatest cost burdens and have been designated as high priorities in the Needs Table. Moderate income renter and owner households experience cost burdens that are similar and the City views their needs as low due to the availability of housing at affordable rates. For example the average rent for a 3-BR apartment in Manchester is \$1,182/month which is below the rent limit of \$1,601/month designated by HUD for Moderate income families.

The development of an Action Strategy for Housing required not just an analysis of the housing needs of the citizens of Manchester, but also an overall assessment of the current market trends and conditions and other Community needs that ultimately will impact upon the success of the City's efforts to provide long term decent and affordable housing. Past experiences with housing rehabilitation programs demonstrate that simply expending funding to rehab properties in deteriorating neighborhoods without addressing other negative influences in the neighborhoods have proven to be ineffective over time. Accordingly, the City has sought to take a holistic approach in the expenditure of HUD and City funds in its efforts to provide affordable housing and allow all City residents increased opportunities and choice in the selection of housing throughout the City.

Additionally, the City compliments its expenditure of CDBG and HOME funds on housing through the allocation of funds for infrastructure improvements, neighborhood centers, crime patrols and other improvements designed to significantly improve the surrounding neighborhoods. Public service activities such as daycare for low-income working parents, budget counseling, health assistance, youth recreation, new citizen assimilation initiatives and various other activities are also funded to support the needs of Manchester's poorest citizens beyond housing are also met. Through this approach the City hopes to ensure that once affordable housing is provided, its quality and that of the surrounding neighborhood will not deteriorate so that benefits from such efforts will remain for the long term.

Program Elements:

Planning & Community Development
Concentrated Code Enforcement - \$74,760
(CDBG), \$10,000 (HOME)
Planning & Community Development
Department Housing Initiative - \$406,416
(HOME), \$75,000 (AHT)

Planning & Community Development
Department Lead Hazard Reduction
Demonstration Program - \$3,967,678 (HUD
Lead Hazard Reduction Demonstration
Grant)
Neighborhood Stabilization Program III
Project - \$3,700,000 (NSP)
Manchester HOME/CHDO Projects -
\$79,750 (HOME)

Benchmarks:

Create 15 units of affordable housing for
low-income families.
Eliminate lead hazards and code deficiencies
in 88 units of housing occupied by income
eligible families.
Create 40 housing units as a result of Neighborhood Stabilization Project activities.
Inspect a minimum of 160 occupancies to ensure compliance with minimum life safety and
housing codes.

Foreclosures:

Developing a strategy in the Action Plan for dealing with foreclosures has not been an area of focus in the past for the City of Manchester as the area economy and the housing market have been quite strong and comparatively one of the stronger markets in the Country. Given the slowdown of the economy and the fact that foreclosures have become a significant issue in New

Hampshire and the rest of the nation has resulted in the City taking a look at the Community in an effort to determine if it is in fact an area of concern. For February 2012, Realtytract.com reported the following: 1 in every 776 housing units in Manchester received a foreclosure filing, 1 in every housing units in the State of New Hampshire received a foreclosure filing and 1 in every 637 housing units in the United States received a foreclosure filing. New Hampshire is considered a State with a high foreclosure rate and has the 25th highest rate of the 50 states.

In April of 2008, a Task Force on Housing convened by the Mayor began assessing the Manchester housing market and identifying issues for which the City will need to develop strategies to address. One of the areas of focus has been on foreclosures and initial data indicate that, similar to trends across the Country, foreclosures in Manchester are increasing. In comparison to other communities in the State of New Hampshire the data indicate that Manchester has the highest level of foreclosures in the State. However, New Hampshire, relative to the rest of the nation, is still fortunate in that the foreclosure activity is not as significant a problem as it is nationally and in adjacent States such as Massachusetts.

Given the rising trend and anecdotal input received from some of the City's housing advocacy organizations such as the Way Home foreclosure nevertheless is an issue of concern that merits close monitoring. Towards the end of being proactive in developing a strategy, a process and program to deal with foreclosures in the unfortunate event that they become enough of an issue in the City, Planning Staff are working closely with members of the Task Force which includes in addition to Staff from Planning and other City Departments; a community banking liaison, a real estate professional, a representative from the Chamber of Commerce, the Executive Director of the nonprofit housing organization NeighborWorks and the owner of Red Oak Properties, one of the larger residential rental businesses in the City.

As would be expected a proactive approach toward this problem is being taken by The Way Home and NeighborWorks Greater Manchester which already have housing counseling programs in place for mortgage default clients. Inasmuch as the City contracts with the Way Home and NeighborWorks Greater Manchester for other programs another partnership aimed at assisting city residents that have had their properties foreclosed on as well as developing a strategy to prevent foreclosures would be helpful. With reference to foreclosures, The Housing Task Force recommended that the City utilize Neighborhood Stabilization Program funding for the redevelopment of neighborhoods experiencing decline due to high foreclosure rates and subprime mortgage-related problems. If necessary, the City will also use Planning & Community Development Housing Initiative funding to establish programming to prevent foreclosure.

Strategy for Improving Management and Operation of Public Housing Units

Public Housing is administered by Manchester Housing and Redevelopment Authority (MHRA). MHRA operates 1,270 units of public housing and administers over 2,000 Section 8 Housing Choice Vouchers. Included in its inventory of public housing, that is available to eligible households at or below 80% of the median income for the City, MHRA lists:

868 zero and one bedroom units (68%);
178 two bedroom units (14%);
201 three bedroom units (16%); and
23 four and five bedroom units (2%).

MHRA owns and operates two different types of public housing developments. Units for the elderly and persons with disabilities are located in its five high rises and at scattered sites throughout the City. MHRA also provides family housing at two major developments and at smaller locations throughout the City. All MHRA public housing developments are located in areas convenient to stores, schools, churches and local public transportation. The larger MHRA developments have community centers and on-site maintenance staff. MHRA provides 24-hour emergency maintenance service for all public housing residents. All public housing in the City is maintained in good physical condition and is inspected annually by MHRA Housing Quality Standards inspectors and randomly selected units are inspected regularly by inspectors sanctioned by the U.S. Department of Housing and Urban Development (HUD).

MHRA gets formula-based assistance from HUD each year under the Public Housing Capital Fund Program. During FY 2011 MHRA's budget under this grant was approximately \$1,381,780. Two levels of activity are covered by the plan: (1) management improvements and (2) physical improvements.

Management improvements include items relating to improving the efficiency and responsiveness of the management of public housing and include funding for various resident initiatives and training.

The balance of the Capital Fund Program funds is for physical improvements which include modernization of public housing, including improving handicapped accessibility to the buildings, energy improvements and other activities that extend the useful life of the buildings.

During FY 2011, modernization efforts included interior building rehabilitation of several scattered sites for the elderly and persons with disabilities; roofing replacement at the Kelley Falls development; heat pipe replacement at the Elmwood Gardens development; various masonry repairs at the Burns High-Rise; window replacement at the Gallen High-Rise; exterior trim and siding replacement at the Elmwood Gardens development; and repairs to the stairwells at Kelley Falls.

Water and energy conservation improvements are being made to all public housing units through an energy services contract wherein the cost of all repairs is financed with funds realized by savings in utility costs. Improvements include new toilets, new low-flow shower heads, low flow aerators for

faucets, various lighting upgrades and replacement, new apartment heating modules at the Gallen High-Rise and new boiler systems at scattered site apartments.

The Leased Housing Department of Manchester Housing and Redevelopment Authority administers 1,813 tenant-based vouchers through the Section 8 Housing Choice Voucher (HCV) Program, which provides assistance to households with incomes below 50% of the area median income. In addition to these HCV units, MHRA administers 104 Veterans Affairs Supportive Housing (VASH) Vouchers for homeless veterans, and 100 Vouchers for Non-Elderly Persons with Disabilities. MHRA's current voucher unit distribution by number of bedrooms is 639 (34%) zero and one bedroom units; 726 (38%) two bedroom units; 420 (22%) three bedroom units; and 113 (6%) four and five bedroom units. MHRA also administers 23 units of assistance through the Section 8 Moderate Rehabilitation Program for Single Room Occupancy Dwelling for Homeless individuals (Mod SRO). This assistance is used to provide housing assistance to individuals at Robinson House.

All HCV and Mod/SRO units must meet minimum housing quality standards to be accepted into the Housing Choice Voucher program. Staff inspects each unit prior to occupancy and annually thereafter to ensure units are maintained in good physical condition.

In addition to providing assistance through its Public Housing and Voucher Programs, MHRA has developed 132 units of service-enriched housing through the Low Income Housing Tax Credit Program. This housing is provided to elderly and persons with disabilities earning within 50% of the median income for the City, targeting applicants who require assistance with at least two activities of daily living. The assistance is provided at Mary Gale Apartments, Brown School Apartments and Laurette Sweeney Apartments.

MHRA RESIDENT INITIATIVES

Manchester Housing and Redevelopment Authority (MHRA) has undertaken a number of innovative resident initiatives. In almost all of these activities, residents have been involved in both the planning and implementation phases.

Police Athletic League (PAL) - Manchester Housing and Redevelopment Authority has been involved in the activities of the Police Athletic League since its inception.

Family Self-Sufficiency - The Family Self-Sufficiency (FSS) program continues to be offered to Housing Choice Voucher residents with 30 participants enrolled during 2011.

Employment – MHRA actively recruits residents of assisted housing for direct employment opportunities with five employed during FY 2011. Manchester Housing and Redevelopment Authority together with the U.S. Department of Housing and Urban Development have authorized a program to educate, train and employ residents on government financed projects. MHRA also works with area providers to offer educational / vocational and supportive services programs to public housing residents.

Activities for Youth - Each year, public housing youth have the opportunity to participate in a variety of an array of programs. Included is the Youth Education and Enrichment Program that offers educational and diversionary pursuits to young people aged 5-18. The Youth Education and Enrichment Program includes a variety of educational, recreational and sports activities designed to provide structured alternatives to unsupervised idle time during the after school hours. Such activities include homework help, tutoring, open gym, computer training, music lessons, cooking and nutrition sessions, ESOL (English as a Second or Other Language), etc. The Youth Education and Enrichment Program operates out of the Bishop Leo E. O'Neil Youth Center on South Elm Street and the Family Investment Center at Elmwood Gardens.

Reach for the Stars Enrichment Program – This program, provided by a private contractor at MHRA's Bishop Leo E. O'Neil Youth Center, provides child care and preschool options as well as a summer program which offers arts and crafts as well as recreational activities.

Elderly Services – MHRA's Supportive Service Program (SSP) provides one meal per day, service coordination and services designed to enable the elderly resident or residents with disabilities to maintain their housing independence. The SSP is offered at MHRA's Low Income Housing Tax Credit properties.

REMOVING BARRIERS TO AFFORDABLE HOUSING

This section describes the strategies and practices that Manchester can revise or initiate in order to improve the system. Also, suggestions for revisions to Federal and state rules and policies are noted.

This section describes the strategies and practices that Manchester can revise or initiate in order to improve the system. Also, suggestions for revisions to Federal and state rules and policies are noted. This section applies to all sources of entitlement funding

Since the beginning of 2007, it has become apparent that the U.S. housing market has been in decline, with foreclosures increasing and sale prices decreasing. The unpredictability of fuel prices – for both homes and vehicles – as well as dramatically increasing food prices has led to fundamental change in how people determine where they live. These factors do not just affect purchased homes, but rental properties as well.

Manchester is not immune to these factors. Even though the city and the region may be in a better position than many parts of the country, there is still a need for action. Statistics show foreclosure numbers not seen in this area since the real estate collapse of the early-1990s. However, with the sub-prime loan collapse and many more homeowners unable to afford their mortgages, there are ramifications that were not experienced back in 1991.

This has also affected the rental market. Up until 2006, rental prices have gone up, making it more difficult for many to afford safe and secure residences. Since the end of 2006, rental prices have stabilized, but with the added costs of food and other essentials, the burdens for these families continue to climb. In turn, this has affected rental property owners. Many owners of one or two multi-family properties, looking to take advantage of low vacancy rates and increasing rents, purchased these properties – many with less than ideal financial and credit situations. Variable interest rate mortgages dramatically adjusted upward from 2006 to today. Many property owners that purchased properties with little or no borrower equity – essentially 100 percent financing – are unable to support their mortgages from the current rental income.

When fuel costs went up, rental prices declined and those with adjustable rate mortgages saw their monthly payments go up, what once seemed sound became financially unmanageable. The result has been more foreclosures, softening rents, plummeting purchase prices and numerous voices on how to address this issue within the city.

This issue is not unique to Manchester or to New Hampshire – in fact, many other regions of the country are doing much worse. In many urban areas across the country, foreclosure rates are reaching highs not seen in decades. For example, Las Vegas, Nevada had a foreclosure rate of one house for every 31 in March 2011. Comparatively, the foreclosure rate for Manchester during that same period was one house for every 776. To put this in perspective, Hillsborough County had one home foreclosure for every 698 homes (second to Belknap County – one foreclosure for every 623 homes). While these numbers are not as bad as other areas, they still must be addressed as part of a comprehensive housing plan.

In the face of these issues which continue today, On April 23, 2008, Mayor Frank Guinta convened a group of city staff and leading business and housing voices in the city to address these issues. The following paragraphs include the findings of the task force and recommendations on the future expenditure of entitlement funding on housing initiatives.

Findings of the Task Force

1. The City of Manchester has an increasing vacancy rate, particularly in the inner-city

In conversations with various landowners within the city, most of them have seen their vacancy rates go above what they deem to be comfortable (somewhere between 3 to 7 percent, depending on who you ask). While many larger property managers are either at the high end of comfortable or at a vacancy rate that is slightly too high for their comfort level, it is apparent that smaller property-owners are seeing vacancy rates much higher than their property can support.

For example, Ron Dupont of Red Oak Realty stated at the May 21, 2008, meeting of the task force that the vacancy rate for many larger property owners that he surveyed was about 8.8 percent in May 2008 (2,551 rented units, 247 vacancies). This is above the 5 percent he states as ideal (allowing these owners to renovate and update properties when they are vacated). However, in what would be considered “urban” areas of the city, that vacancy rate was around 15 percent and up to 20 percent – which is much higher than comfortable. In addition, it is believed that due to the falling prices for multi-family properties and the increase in foreclosures of said properties, that the vacancy rate for properties owned by low-level investors is even higher.

To entice more people into units, many of the larger property owners are offering incentives such as free first-month of rent or free utilities (such as heat). In addition, many developers are looking outside of Manchester to build new properties. As stated by Dick Anagnost in his meeting with the committee, there is a scarce amount of land to build new housing in the city and he is actively looking at adjacent communities like Londonderry to build new housing stock.

2. Manchester’s rents are going down after a high in 2005

According to the New Hampshire Housing Finance Authority (NHHFA), the average rent in Manchester peaked at \$1,046 for the average two-bedroom home in 2005. Before this, rents saw a sharp spike from \$799 in 2000 to \$1,046 in 2005. Rents declined to \$980 in 2007. In 2008, rents increased to \$983 and increased to \$988 in 2009.

The fact that rents have decreased since 2005 is not all bad news. Many social-service advocates have stated that rents in Manchester were pricing out the average resident or family in the city. According to the data presented in the NHHFA 2009 Rental Survey, the household income required to afford the average monthly rent for a two-bedroom apartment in Manchester would be \$39,520/year. The annual adjusted median income for households of three in Manchester is \$69,188. Households with incomes at 50% of the median are earning \$34,800/year. An affordable rent for a family of three earning 50% of the median income would be \$870/month. It becomes even more problematic for very low-income families (households earning 30% of the median income). An affordable rent for a family of three earning 30% of the median income (\$20,750) would be \$519/month.

Remember the average rent for a two-bedroom apartment in Manchester is \$988/month.

3. The foreclosure rate in Manchester is as high as its been seen since the early-1990s

In numbers reported from real-data.com, the number of foreclosed properties in Manchester as of November 2008 is higher than at any time since the Web site started tracking numbers in 2000. Going back further, the Mortgage Bankers Association – cited in a June 2008 report by the Federal Bank of Boston – show that foreclosures have not been this high since 1993.

At that time, the state and city were still recovering from the federal takeover of five Manchester-based banks. There were 281 foreclosures that occurred in Manchester from January 2008 through November 21, 2008 compared to 705 foreclosures in this region. Forty percent of all foreclosures in the region occurred in the City of Manchester. Forty-six percent of all housing units in the region are in Manchester. In the first 11 months of 2008, there has been a fifty percent increase in the number of foreclosed properties versus the same time in 2007. These numbers are also verified by looking at the legal notices in the *New Hampshire Union Leader*, which has seen a profound increase in foreclosure notice listing in its pages since last year – the predominance of which are from Manchester and its surrounding communities.

In following up with the first two findings, many first-time property owners or those that own one or two properties found that the market forces that led to decreases in rent were counter to the investor's ability to pay the mortgage. Add to this the massive increase of fuel oil prices since 2006, which jumped to more than \$4.00/gallon in June 2008, and many property owners faced a dilemma: Pay the renters' heat as an incentive, which doubled in the past two years; or not offer free heat and face an enhanced risk of vacancy. This led to many investors losing their property or not investing in needed repairs to properties, making them run-down.

Many experts in the housing and real estate field believe that the bottom hasn't been reached in regards to foreclosures.

4. The number of Manchester residents considered low-income or lower-middle income has increased, while the overall population of Manchester has declined.

Certainly, the biggest surprise and the most important statistic that came out of the task force meetings is that the low-income population is rising in the city. Initial HUD data provided to the committee by the city planning office indicated an increase in the low-moderate income (LMI) population. The LMI population is defined as having income levels below 80 percent of the area median income. In 1990 42.6 percent of the city's population met the LMI criteria. In 2005, the LMI population rose to 49.9 percent. In 2007, the figure was at 52.2 percent of the population. Given the concern raised by this trend, the committee sought to fill in the gaps for the missing years as well as compare the trend to other cities. The statistic has proven to be difficult to gather and not readily available. Therefore, the committee elected to look at poverty data as a national standard with readily available information.

According to numbers provided to the committee by the Nashua Regional Planning Commission and the U.S. Department of the Census American Factfinder, Manchester is seeing an increase in families below poverty. This is counter to the trend in the state's second-largest city, Nashua.

Comparison of families below poverty between Manchester and Nashua

| Families below poverty | 1999/2000 | % | 2006 | % | 2007 | % |
|------------------------|-----------|-------|-------|-------|-------|--------|
| Manchester | 2,023 | 7.70% | 2,416 | 9.80% | 3,032 | 11.90% |
| Nashua | 1,119 | 5.00% | 1,130 | 5.30% | 987 | 4.40% |

Meanwhile, the population of Manchester has declined, albeit slightly. According to the New Hampshire Office of Energy and Planning, Manchester had a population of 109,364 as of July 1, 2006. However, on July 1, 2007, the population dropped to 108,580 – a decrease of 784 people or 0.7 percent. This is a reversal of the slow, consistent growth the city had seen since the 2000 U.S. Census report.

A tangible way to understand this number is to look at the waiting list for housing and vouchers at the Manchester Housing and Redevelopment Authority. As of July 2008, they had a waiting list of 9,600 applicants for housing subsidy. More importantly, the average applicant in 2008 the average income for residents within MHRA's properties had an adjusted median income that was 23 percent of median. In 2002, this number was 37 percent. In 2009, the waiting list for housing subsidy increased to 10,257.

This may be one reason to explain why, despite rents going down and more landlords offering incentives to potential tenants, that the vacancy rate is rising. While rents may be decreasing, the cost of fuel and other goods and services have increased. The population that is leaving is often those that cannot afford to live in the city, and, according to the property owners that spoke to the committee, they are seeing more people living in each unit, essentially "doubling-up." This allows for more people to share the cost of expenses without having to pay separate rent.

5. Manchester provides much more of its share of "affordable" housing as compared to the surrounding communities.

According to a study by the Southern New Hampshire Planning Commission, Manchester and Derry are the only two communities within the commission's district to provide sufficient workforce housing. In its 2005 housing assessment for the region, SNHPC created a statistic called "fair share" housing, which is the amount of housing that should be available in communities for renters that are less than 80 percent of Area Median Income (AMI) and pay more than 30 percent of household income into housing.

The assessment looks at the 13 communities in the region consisting of Auburn, Bedford, Candia, Chester, Deerfield, Derry, Goffstown, Hooksett, Londonderry, Manchester, New Boston, Raymond, and Weare. According to the projections in the study, 13,106 housing units fall into the category of being affordable to renters below 80 percent of AMI. The assessment then spreads those units out throughout the region as a percentage of units in each town to demonstrate what the "Fair Share" should be. Manchester and Derry are the only jurisdictions which meet the "Fair Share" test. In fact, Manchester exceeds its fair share by more than 100 percent. Of the designated affordable units in the region, 34 percent should be Manchester's "Fair Share." In fact, the total for Manchester is 78 percent.

More detailed data from the study is available online at: http://snhpc.org/pdf/House_Assess.pdf

- **New laws in New Hampshire have put the spotlight on lead mitigation in Manchester – and the cost to address it.**

In 2007, the New Hampshire Legislature passed and Gov. John Lynch signed Senate Bill 176. This new law was “relative to lead paint poisoning and establishing a commission to study the current childhood lead poisoning prevention law, policies, and standards.”

The new law does the following:

- Lowers the blood lead level that determines when a child is lead poisoned from 20 to 10 micrograms per deciliter of blood;
- Allows the commissioner of the department of health and human services to inspect other units of a multi-unit dwelling when a child has been found to be lead poisoned in one of the units;
- Extends the time that interim controls may be used as an alternative to lead hazard abatement under certain circumstances; and
- Establishes a commission to study the current childhood lead poisoning prevention law, policies, and standards

As expected, this is an issue of great importance to property owners. As stated by Ron Dupont, Red Oak Properties “The cost to de-lead units can be debated. However, certainly most units that I have recently been made aware of (needing lead mitigation) are closer to \$25,000 per unit rather than the \$10,000 per unit that is available through the City of Manchester’s Lead Hazard Control Program. If the average multi-unit in the city is 5 units and there are 100 cases of lead poisoning and the cost to remove lead is \$25,000 per unit the total cost of lead removal in Manchester alone will be approximately \$12.5 million a year.”

It should be noted that this is the experience of one developer in the city. The cost to remove or encapsulate lead in a property varies widely by property.

It should also be noted that Ron Dupont praised Tim Soucy, the Director of the Health Department, for “sending the two immigrant agencies in the state a letter that directed them do everything possible to place refugees in lead safe housing.”

According to the New Hampshire Childhood Lead Poisoning Prevention Program, there were fifty-six instances of elevated lead levels in children in 2007. In 2008, 49 cases of lead poisoning were reported.

- **Properties in the City are susceptible to becoming run-down or lost to foreclosure due to increased heating costs.**

Most dwelling units in Manchester are heated by oil or natural gas. Even with the recent slide of crude prices, this may still be a serious challenge for homeowners and renters in the City and will be a major factor in reducing the affordability of housing for many households.

While the current prices have moderated, the long-term trend could continue upwards. This will be most felt in those older structures that tend to have inadequate insulation, outdated heating systems and are likely less energy efficient.

- **The overall housing issues that concern Manchester went beyond the scope of the task force, but its findings laid the groundwork for a committee that can address the issue.**

The work of this committee was consistent and addressed numerous issues. However, its charge was to address specifically the issue that Mayor Guinta charged it to do, which was to determine how to spend HOME funds within CIP.

During the task force's meeting, it became apparent that the work of this group would be beneficial to a long-term study of housing and demographic trends and estimates for the city. It also became apparent that a group like this – consisting of staff, residents and business leaders – would be beneficial to the Board of Mayor and Aldermen as well as city staff, as it could provide comprehensive and Manchester-centric housing research for the city. Most information available to the city is either partial in its scope (i.e. refers to Hillsborough County or Southern New Hampshire); outdated (i.e. numbers come from Census 2000 or, like median income, updated less than yearly; or are difficult to obtain (i.e. Real-Data.com requires a subscription to obtain numbers about foreclosures). However, a committee like this with its blend of participants would be able to obtain the most up-to-date and drilled-down numbers.

This section describes the recommendations on the expenditure of entitlement funding on housing activities as well as the appointment of a Standard Board in accordance with Section 3.13 of the City Charter to advise the Board of Mayor and Aldermen on housing issues.

Recommendations

1. Until the market dictates it, no CIP funds should go toward the new development of properties. That time does not appear to be in the near future.

As stated by developers, city staff and others, city funds would be most effective if directed to address the condition of existing housing stock in declining neighborhoods, as opposed to creation of new housing stock. While the annual amount of HOME funds (\$400,000 to \$600,000) that is appropriated for the development of Workforce Housing is not a lot of money, it can make a difference in addressing many of the redevelopment needs in the city and can often be leveraged with funds from other non-profits and private organizations. For the past several years, the city has taken an active position in supporting new housing development. It was agreed that the city should not discourage new development by the private development community; however, at this point it does not need to subsidize those units with entitlement funding.

2. Entitlement funds should be utilized in “at risk” or “fire line” neighborhoods within the city to “stabilize” them.

These neighborhoods stand between blighted and more economically secure neighborhoods within the city. However, the task force would ask the Planning Department to determine what neighborhoods would fall under the classification of “at risk.”

3. In stabilizing these neighborhoods, the funds should be used in any combination of ways.

- Multi-family units to partake in weatherization or energy-efficiency rehabilitation:
- Healthy home projects, such as lead and asbestos mitigation
- Leveraging infrastructure improvements/neighborhood revitalization projects (i.e. Rimmon Heights)

The committee felt that addressing one of these three issues would provide the most impact for the city's money. For example, some in the task force felt that there is need for assistance on energy efficiency improvements to existing housing stock such as insulation, weather-stripping and efficiency improvements to heating units. However, others believe that providing increased assistance to provide lead paint abatement is also an important public goal. Because of the new emphasis to address lead issues, there was a need to make sure money was available to fund existing or new lead abatement programs.

In addition, the task force believed that addressing the at-risk neighborhoods also meant addressing the infrastructure of these areas. Since the Planning Department already has a template for how to address this (Rimmon Heights) and the city has reached out to HUD to address these areas (Granite Square), it makes sense to continue these programs.

4. Manchester should utilize the U.S. Department of Housing and Urban Development's Neighborhood Stabilization and "\$1 Good Neighbor" Programs.

At the end of September 2008, the U.S. Department of Housing and Urban Development released about \$4 billion in funds for hard-hit neighborhood nationwide. Neighborhood Stabilization Program (NSP) will provide emergency assistance to state and local governments in the redevelopment of neighborhoods experiencing decline due to high foreclosure rates and subprime mortgage-related problems. New Hampshire, through the Community Development Finance Authority, will be receiving \$19.6 million for this program.

The program is designed to help address foreclosure problems in designated neighborhoods in order to make them more stable, sustainable, and competitive. In July of 2009 the City received \$7.7 million dollars to complete various initiatives in the City.

In addition, the city was made aware of HUD's \$1 Good Neighbor Program, which provides municipalities with the opportunity to purchase property that has been foreclosed for \$1 and to utilize it as they wish.

It is imperative that city staff and applicable housing agencies develop a mechanism to purchase, rehabilitate or demolish these properties, when appropriate.

5. This committee should become a standing board, as stated by Section 3.13 of the Manchester Charter, and advise the Board of Mayor and Aldermen on an annual or as needed basis.

Longer term, there will be a need for a more comprehensive strategy to help the city address the major changes in its housing stock. While this committee was able to research many of the housing issues,

and, if asked by Mayor Gatsas, will continue to evaluate the housing needs of the community, a permanent process should be formalized. A standing committee that is responsible for reporting to the Board of Mayor and Aldermen on an annual (or as needed) basis will allow policymakers the ability to have up-to-date information to guide them in their decisions. This will also assure that there is a committee that eyes the housing trends as well as keeps the lines of communication open between the city, property owners, and housing advocates.

The City will continue to take action steps in an effort to remove barriers to affordable housing. Action steps that the City has taken in the past have included the following: a newly revised and accepted Zoning ordinance; flexible parking arrangements; density provisions; housing development in the Millyard and upper story Downtown commercial space as well as the adoption of new building codes. Despite the City's efforts, the barriers that prohibit many of Manchester's citizens from obtaining safe and sanitary affordable housing still exist. It is important to note, that while the barriers still exist, a significant number of affordable housing units continue to be added to the housing stock each and every year. To achieve the goal of providing quality affordable housing for all of Manchester's residents, the City will continue to utilize entitlement and Affordable Housing Trust funding to implement strategies that are consistent with the Consolidated Plan and the 2002 and 2008 Action Strategies for Housing.

LEAD BASED PAINT AND HEALTH HAZARDS

The following provides a description of the strategies in place for the remediation and management of lead based paint and related health problems in the City.

History of Lead Programs in City

- o 1997 Manchester identified as a high risk community for lead poisoning
 - o Jan 2006 – completed first Lead Hazard Control Grant (\$895,724)
 - o Created 144 Lead Safe Homes
 - o Exceeded HUD benchmarks in every category
 - o Feb 2010 – completed first Lead Hazard Demonstration Grant Program (\$1,800,000)
 - o Inspected 382 Homes
 - o Created 243 Lead Safe Homes
 - o Exceed HUD benchmarks in every category
- April 2011 – awarded second Lead Hazard Control Grant (\$3,967,678)
- Plan to inspect 275 homes using Healthy Homes One Touch inspection
 - Plan to create 250 Lead Safe Homes
 - Plans for training and outreach to 5000 individuals

Effectiveness of Lead Hazard Control Program (Manchester Housing Initiatives)

- o Since 2003 this program has
 - o Brought over \$6,600,000 in federal funds into the City
 - o Created lead safe homes for 387 families
 - o Helped to avoid foreclosure on 27 homes
 - o Increased capacity of lead abatement contractors in the city by 500%
 - o Through consultant and partnering organizations
 - o trained over 1000 NH renovators in lead safe work practices
 - o Created Lead Safe Homes for an additional 50 families

Additional Program Elements

- Health Department Healthy Homes Peer Intervention – \$10,000 (FY 2012)
- Health Department Childhood Lead Poisoning Prevention – \$15,000(FY 2012)
- Working with Manchester Partnership for Safe and Healthy Homes following protocol from Tohn One Touch Pilot
 - Provide Healthy Homes Training for Key Staff
 - Provide MHD with 150 lead clean up kits, mattress covers, pillow covers, HEPA vacs, cleaner and towels
 - Work with Manchester Code Enforcement to create Healthy Homes inspection reports used by program
 - All Lead inspections become Healthy Homes Inspections

Benchmarks

- Disease prevention and education activities to benefit 50 children, averting 250 lost school days.
- Lead-based paint risk assessments in 275 housing units.
- Increase supply of certified lead safe housing by 250 housing units
- Lead poisoning prevention and in-home health hazard information provided by peer educators to 100 households.

Other Program Elements

The City of Manchester has been actively involved in childhood lead poisoning prevention since the 1970's when the Manchester Health Department (MHD) began studying the extent and nature of Lead-Paint Poisoning in Manchester, NH. From the start, Manchester had a strong focus on screening children for exposure to lead paint hazards, community-wide education on the public health hazard caused by deteriorating lead paint and promoting action to prevent lead poisoning. Since 1997 when Manchester was identified as a high risk community for lead poisoning by the NH Office of Health and Human Services, the City has implemented a comprehensive approach designed to eliminate the hazards of lead based paint through a community process of planning, education and action to protect children.

The manufacture of lead paint for residential use has been banned since 1978 and yet the paint still poisons approximately one hundred and fifty Granite State children a year, sometimes with significant long-term effects. Due to the nearly 16,000 pre-1940 homes in the city of Manchester ** the Centers for Disease Control and Prevention recommend that all 1- and 2-year-old children residing in Manchester be tested for lead paint exposure. In 2009, (most recent data available) 140 New Hampshire children under the age of six were newly identified with an elevated Blood Lead Level and 49 of these children resided in the City of Manchester. The State of NH Childhood Lead Poisoning Prevention Program considers the level of action (childhood poisoning level) to be 10ug/dl (micrograms per deciliter of blood) These children are more likely to suffer persistent developmental delays, learning disabilities and behavioral problems as a result of their exposure to lead. In 1997 the City of Manchester was declared a "high-risk community" for lead poisoning by the NH Office of Health and Human Services due to the abundance of older housing stock with lead paint. Another risk factor is the income level of the residents.

Many children who have been poisoned by lead can have problems in school, such as behavior problems, short attention span, problems in language or speech development, hearing and visual impairments, or developmental delays that can make them entitled to special education services. According to a study by the Harvard School of Public Health, lead abatement results in a total cost savings of \$45,000 per building over ten years. The savings resulted from medical and special education costs, as well as increased productivity among children protected from lead poisoning. Estimates in NH range to 10,000 students with lead poisoning in our school systems as of 2009.

** Scout search engine for NH Real Estate estimates 45,892 homes and apartments currently in Manchester, and indicates that 34.7% were built in 1939 or before. That total would be 15,925. HUD estimates that 90% of pre 1940 homes contain Lead Paint Hazards, which would bring the total in Manchester to 14,332.

Historically, the City of Manchester has been known as a popular area for refugee resettlement and a diverse mixture of races. While still 92% Caucasian, Manchester is now reporting over 70 languages in its schools, and is growing in ethnic and racial diversity. Since 1996, more than 2000 new arrivals have resettled within the community from countries of origin which include Bosnia, Iraq, Kosovo, Nigeria, Russia, Sudan, Somalia and the Ukraine. In addition, the Hispanic population also continues to grow.

In 2000, a two-year-old Manchester girl from the country of Sudan was the first reported death of a child from lead poisoning since 1990 in the United States. The child succumbed to complications from lead poisoning with a blood lead level of 391 ug/dl (micrograms of lead per deciliter of blood). The subsequent investigation implicated that lead paint and dust in the home was most likely the source of poisoning.

When compared to the rest of the state, Manchester experiences four times as many cases of lead poisoning for every child under the age of 6 years, and 33% of the state's total number of cases of lead poisoning. In 2008, 1.9 % of all children screened in Manchester aged 0-71 months had an elevated BLL. However, this is deceptive – see rates below

The determinants and risk factors include the following, which are specific to Manchester;

- The City of Manchester has an abundance of **old housing stock**, with 80% of the dwellings in six center city tracts being built prior to 1940.
- Manchester children are almost twice as likely to live in **poverty** as children in the State of New Hampshire.
 - According to the 2009 American Community Survey, Manchester's estimated percentage of children living at or below 100% of the federal poverty level (27%) has surpassed the city of Boston (22%) and New York City (26%).¹ In addition, 48% of students within the School District are enrolled in the Free and Reduced Meals Program, which is income qualifying at or below 185% of the federal poverty level.² Moreover, it is estimated that over 32,000 residents of all ages in Manchester are living below 200% of poverty
 -
- **Lead screening rates continue to be low.** In 2008, only 73.6% of 1 year old children and 45.9% of 2 year old children received lead screenings. In fact, rates have decreased in recent years, in spite of the CDC recommendation.
 - Only about 1 in 3 children are screened even once between birth and age 6 and the likelihood is that the actual percentage with EBL is higher than the 1/9% reported in 2008. The City is continually working to improve the screening rate.
- As of January 1, 2009, the database contained 265,911 records of blood lead test results from 177,099 individual New Hampshire residents dating back to 1985.
- From 2006 to 2008, there were 5,415 Manchester children (unduplicated count) ages six months to four years enrolled in WIC.
- Almost 23% of all Manchester WIC enrolled children age six months to four years were classified as having iron deficiency, placing them at increased risk for lead absorption.
- Recent **racial/ethnic shifts** within the community have impacted the ability of families to access the **health care system**. From 2002-2008, 1,504 new refugee arrivals have resettled within the community

To better coordinate its lead poisoning prevention activities, the Health Department has formed the Manchester Partnership for Safe and Healthy Homes. This group of stakeholders is comprised of pediatric providers, the public health community, tenants, property owners, other city officials, community-based organizations and others concerned with the issue of childhood lead poisoning and other health issues such as asthma, carbon monoxide poisoning, fire safety, radon exposure, and excess moisture. The coalition seeks to educate the residents of Manchester regarding Lead Poisoning Prevention, increase collaboration between agencies as well as affected parties (i.e. families with lead burdened children and property owners), support universal screening and promote an increase in safe housing, and thereby decrease the incidence of Lead Poisoning and other hazards in Manchester. Actions supported by the coalition in addition to those noted above under the Health Department are included in this plan

During 2002, the predecessor of the Manchester Partnership for Safe and Healthy Homes called Greater Manchester Partnership against Lead Poisoning (GMPALP) completed a 2002-2010 strategic planning document: Preventing Childhood Lead Poisoning in Manchester, New Hampshire, Recommendations for the Community. The draft of this strategic plan formed the basis of the City's comprehensive lead hazard control plan.

In 2002, the City applied for and was awarded a HUD Lead Hazard Control Program grant to provide lead-paint hazard mitigation. By the end of the 2003-06 grant period, Lead Hazard Control work was completed in 144 units, using \$895,724 of HUD Lead Hazard Control funds and \$594,902 in matching funds - \$1,490,626 total. To maximize impact, the City designated a target area, eleven contiguous census tracts, that contain the City's highest concentration of pre-1940 housing, housing with deteriorating lead paint, low income families with young children, lead poisoned children & children with elevated blood lead levels and at-risk minority and refugee families.

In 2006 the city applied for and was awarded a 2006 HUD Lead Hazard Reduction Demonstration Program grant. The award amount was \$1.8 million, and the city pledged to leverage an additional \$901,904 to provide lead-paint hazard mitigation in 240 housing units during the Grant Period: 2006 – 2010. By the end of the 2006-2010 grant period Lead Hazard Control work was completed in 245 units, using \$1,800,000 in HUD funds and \$901,904 in matching funds - \$2,701,904.

The City's Community Improvement Program manages the grant, monitors compliance with regulations, and insures consistency with the City's Consolidated Plan, Annual Action Plans and Impediments to Fair Housing Plan. The Manchester Health Department provides community health nurse services and helps monitor project outcomes related to child and environmental health risk factors

Recognizing the need for public awareness of the lead paint hazards, the City's Health Department, and the Manchester Lead Hazard Control Program have conducted extensive outreach programs and media campaigns, including radio and television public awareness and most recently released the Greater Manchester Community Needs Assessment for 2009.

These combined programs have had several levels of impact on reducing environmental hazards that affect children's health in the City of Manchester from 2000 – 2011.

- 4500 Individual families protected their children with the help of in-home education, use of HEPA vacuums and lead-dust cleaning supplies, referrals for screening and supportive services of transportation and Spanish translation.
- Distribution of lead prevention information to the homes of over 4,000 Manchester households;
- Screened 19,603 young children for lead poisoning;
- Provided lead case management services to an average of 583 children and their families;
- Remediated lead hazards in over 500 low/moderate income apartments and homes.
- Participated in lead prevention and intervention in-services for 4 primary health care practices;
- Convened community stakeholders through the Greater Manchester Partners against Lead Poisoning.
- At least 400 property owners learned to work with tenants and community resources to reduce exposure to lead hazards.
- Public Awareness on lead poisoning prevention was the focus of workshops, information displays and several public television broadcasts during the grant periods, such as;
 - Lead abatement contractor class (10 trained) Sept 2011
 - Boys and Girls informational booth (4500 received information)- September 2009
 - Cable television broadcast (60,000 viewers)- July 2009
 - Cable television broadcast, Vista Spectrum (120,000 viewers)- March 2008
 - Landlord Newsletter (circulation of about 1,000) – March 2008
 - Union Leader Sunday paper press release (estimated readers 71,000) - February 2008
 - Daily Express press release (estimated readers 24,000) - February 2008
 - Manchester Health Department Realtor's event – February 2008
 - PSNH Property owners informational event – February 2008
 - CLP hosted a lead safe renovator class (18 were certified) – October 2008
 - The Way Home presentation, New Home Buyers seminar – December 2007
 - NHPR outreach and education coordinator interview – November 2007
- Building on the success of some older outreach endeavors
 - Fair Housing, Housing Discrimination Training talk – May 2004
 - The Dartmouth Hitchcock Health Fair information display – April 2003 & 2004
 - MCTV Your Health broadcast– October 2002, June 2003
 - Landlord Information Meeting (15 attended) – July 2003
 - Landlord Newsletter (circulation of about 1,000) – June 2003
 - Kids Fest booth (200 received information) – May 2003
 - Lead 101 training (hosted) for Headstart Family workers – January 2003

In 2009 the city applied for and did not receive HUD Lead funding for the next cycle of 2009 – 2011. The needed lead remediation is currently being managed by the State Lead Grant program (coordinated through the City's rehab program) or by city rehabilitation funds.

HUD provided a debriefing for the City and consultants on the reasons for the lack of funding, (which mostly had to do with competitive funding proposals from larger cities and strongly encouraged Manchester to apply again in 2010.

To maximize impact, the City has increased its designated target area from eleven to fifteen contiguous census tracts. These census tracts contain the City's highest concentration of pre-1940 housing.

housing with deteriorating lead paint, low income families with young children, lead poisoned children & children with elevated blood lead levels and at-risk minority and refugee families.

In 2010 the city applied for and was granted a \$3.9 million dollar lead hazard demonstration grant. These funds will be matched with an additional \$1.4 million of local and State funds, for a total of nearly \$5.5 million to be used to remediate lead paint and related hazards over a period of 3.5 years. Goals of the program include:

- Focused lead hazard control activities in a target area identified with high lead hazard risk factors. Paint inspections/risk assessments in at least 275 units exhibiting high lead hazard risk factors.
- Lead Based Paint Hazard Control (LBPHC) activities in 250 units, focusing on window replacement, addressing friction impact surfaces, and paint stabilization.
- Working through our partner at MCRC
 - Provide 2 lead abatement contractor training classes
 - Provide 2 healthy homes inspector classes
 - Provide 2 risk assessor training classes
 - Provide 4 dust wipe technician classes
 - Provide 8 RRP training classes
 - Provide business management training for new low income businesses
 - Provide basic financial management training
- Improved blood lead level screening of children in the designated high-risk neighborhoods.
- Outreach
 - Lead awareness and safety information provided to
 - 4 medical offices
 - 6 parent and/or tenant groups
 - 1500 Property Owners
 - 2000 renovators, contractors, risk assessors
 - 150,000 members of the general public
 - Outreach methods
 - Website, mailings, meetings, community events, public and cable TV and radio.
- Create a transition team to move from a “lead” program to a “healthy homes” program which is required by HUD, recommended by the National Center for Healthy Home and EPA, and will enable inspectors to use a one-touch approach and address other hazards while inspecting for lead.

In 2009, the Office of the Surgeon General released *The Call to Action to Promote Healthy Homes*¹³ and defined the Healthy Homes as a holistic and comprehensive approach, which provides public health professionals, including environmental public health practitioners, public health nurses, and housing specialists, the requisite training and tools necessary to address the broad range of housing deficiencies and hazards associated with unhealthy and unsafe homes. A comprehensive, coordinated approach to healthy homes will result in the greatest public health impact; the following items were cited within the report as reasons for adopting a healthy homes approach:

More Efficient - Directing resources toward a single disease or condition rather than working to improve the overall housing environment is inefficient and does not address residents' health and safety risks holistically. Consequently, some practitioners and researchers have begun promoting a more comprehensive and coordinated approach to improving health and safety in homes.

More Cost Effective - Health care workers who visit homes also recognize that the residents they serve often face multiple health and safety issues. Due to economies of scale and more efficient use of human and other resources, a holistic approach can be less expensive than addressing problems individually.¹³

Enhances Housing Affordability - Lastly, the holistic approach may enhance housing affordability both by reducing the costs associated with uncoordinated housing improvements and because one intervention may address two or more adverse health conditions. For example, repairs to deteriorated lead-based paint caused by a roof leak can be less expensive if the roof leak and the deteriorated paint repairs are coordinated; just repairing the paint without fixing the leak would be more expensive because deterioration would continue, leading to more repairs and increased costs over the long run. Repairing holes in floors may not only prevent falls but also reduce the possibility of pests entering the house.¹³

The National Healthy Homes Program identifies seven principles to make homes safer. Healthy homes should be dry, clean, pest-free, safe, contaminant-free, ventilated, and well-maintained.

Our partner, the Manchester Health Department (MHD) has already started to integrate the Asthma and Lead Programs by coordinating the delivery of medical and home assessment services. A Nurse Case Manager addresses the medical management issues for lead poisoned and severe asthmatic cases and works with an Environmental Health Specialist to provide healthy homes assessments. This effort has resulted in a more comprehensive and efficient use of Department resources, as well as better service delivery for Manchester residents.

The last goal is to provide a framework for community partners to design strategies to build the city's capacity to sustain the LBPHC work after the 2011-2014 HUD LHRDP grant period.

ANTI-POVERTY STRATEGY

This section consists of actions and strategies to be implemented by the City that will result in the reduction of households with incomes below the poverty line, to the extent local efforts can effectuate a change.

While no single agency or office in the City of Manchester has overall charge of an “anti-poverty strategy”, many programs operate under the premise of mitigating the cause of poverty, and making significant, permanent improvements in the lives of low and very low-income residents. It is also clear that the effort to increase the supply of affordable housing, services and jobs is an important part of an anti-poverty strategy. The lack of sufficient affordable housing in any community contributes to the economic difficulties of individuals or families who can barely afford – or who cannot afford – shelter. Conversely, when low or very low-income individuals are expending no more than thirty percent of their income on housing, they presumably have the ability to pay for other essential needs, such as food, utilities and healthcare. Thus, the City’s and agencies’ programs and policies address the spectrum of issues often facing the poor or near poor in our society.

Other efforts to reduce poverty, administered by various local human service agencies include:

Emergency and Crisis Oriented Services:

Health Services
Nutrition
Energy Assistance
Domestic Violence Prevention
Drug and Substance Abuse Treatment
Crime Prevention
Immigrant & Refugee Services

Counseling
Affordable Housing
Child Development Programs/Day Care
Services
Elderly Services
Mental Health and Mental Retardation
Services
Veterans Services
Rehabilitation Services
Recreation Programs
Youth Service

Comprehensive Program Services:

Employment and Skills Training
Vocational and Remedial Education
Budgeting and Personal Finance
New Citizen Assimilation Initiatives

Illustrative Examples of the City's efforts to reduce poverty appear below:

Housing: Affordable Homeownership programs

The efforts of the Community Improvement Program and its subrecipient agencies to develop additional affordable housing, preserve ownership and to provide transitional housing also contributes to the anti – poverty strategy. Subsidies and low-interest loans for rental housing, ship and rehabilitation programs allow low-income families to obtain quality housing without expending the majority of their income. It is important to note that due to the poor economy and high foreclosure rates, the City has suspended it's home ownership programs.

The New Hampshire Community Loan Fund, the New Hampshire Housing Finance Authority, NeighborWorks Greater Manchester and others make thousands of dollars in interest subsidy and mortgage financing available each year to low-income renters who are seeking to purchase their first homes. Homeownership is commonly perceived as a possible route toward financial stability. In addition to the programs offered by these agencies, private lenders throughout New Hampshire are making special efforts to approve mortgage loans to lower income households.

Public Housing: The availability of public housing allows many individuals and families to live in safe, adequate housing for a reasonable rent. Manchester Housing and Redevelopment Authority operates 1,270 units of Public Housing and manages 2,000 units of Housing Choice Voucher (formerly Section 8) assisted housing.

Homeless Prevention and Rapid Re-Housing Program: Several human service agencies provide services intended to keep individuals or families from becoming homeless. With the support it receives from the Community Improvement Program, these organizations assist vulnerable families at risk of homelessness by providing services such as tenant/landlord mediation, housing counseling, security deposits, rent subsidies, utility payments and transitional housing. The prevention of homelessness is a central piece of the City's anti-poverty efforts.

Shelters and Services: Manchester's comprehensive shelter system provides a variety of services designed to transition individuals back to permanent housing. Services commonly include but are not limited to the following: adult literacy programs, job training, GED courses, parenting education and the treatment of substance abuse. In addition, many shelters have secured additional funding through Federal and foundation grants to provide transitional living skills in the shelters programs.

Manchester Housing and Redevelopment Authority (MHRA) continues to operate a Housing Choice Voucher Family Self-Sufficiency (FSS) Program. MHRA's FSS strategy links affordable housing to job training and higher education. It also recognizes that it is important to provide focused, coordinated services to low-income clients. Participants in the Family Self-Sufficiency Program enroll for a period of five years. They agree to become free of public assistance and achieve economic independence. Additionally, FSS participants are encouraged to avail themselves of MHRA's Homeownership Program which provides the tools necessary for these participants to become successful, independent homeowners.

Economic Development: Programs supported by Community Development Block Grant Funds (previous years funding), including the Section 108 loan program, Business Code Compliance and the Revolving Loan Fund Program, have prioritized the expansion of economic opportunities emphasizing the retention or creation of permanent jobs with a wage adequate to allow greater individual self-sufficiency.

Also, the City's Neighborhood Revitalization Strategy Area and Neighborhood Stabilization Program Initiatives emphasize the need for business location and investment in targeted areas. In the coming year, the Manchester Community Resource Center will provide employment-related services to 550 individuals residing in the inner City. The designation of the Neighborhood Revitalization Strategy Area supports the premise that selected neighborhoods in the City's urban area can become centers of renewed economic activity and job creation for area residents.

Healthcare: As medical costs can often be an extraordinary expense for those least able to find consistent affordable healthcare, the City supports projects like the Pharmaceutical program operated by the Manchester Community Health Center and the Pediatric Clinic Services provided by Child Health Services. The Manchester Health Department also provides comprehensive healthcare service to those individuals who cannot access traditional services. As a result of City programming, medical and dental services will be provided to a minimum of 1,000 individuals.

New Citizen Assimilation Initiatives: Due to Manchester's designation as a refugee destination, several issues have surfaced with reference to this population's access to services and assimilation to a new lifestyle. Funding has been committed as a part of the 2013 Community Improvement Program to fund the Southern NH AHEC Interpretation Training, Southern NH Services New American Africans – After School Program and the Holy Cross Family Learning Center – Staff Support.

LOCAL GOALS, PROGRAMS AND POLICIES FOR THE REDUCTION OF POVERTY

Efforts to reduce or eradicate poverty must be designed to impact the underlying causes of poverty. These programs should ultimately make significant and permanent improvements in the lives of the extremely low and very low-income residents to be considered effective. Strategies aimed at increasing their ability to earn income are essential. Job training and education, healthcare, provision of daycare for single parents and transportation to work all need to be a part of this effort to be effective. Providing affordable housing also plays a role.

Program Elements

The City's strategies in 2012-2013 to assist in the effort to eliminate conditions that foster poverty include the following:

Easter Seals – Child Care and Family Resource Center Program: provides child daycare services to qualified families, thus allowing parents to work or receive employment training - \$30,000 (CDBG)

New American Africans - funding to facilitate assimilation of Manchester's African youth into the community - \$7,000 (CDBG)

Holy Cross Family Learning Center – Staff Support - \$10,000 (CDBG)

Health Department Community Oral Health Collaborative – provide dental care to children who do not have access to these services - \$5,000 (CDBG)

Health Department Neighborhood Health & Nutrition Program - Reduce Manchester's childhood obesity rate as a result of providing community based nutrition programming to high risk families - \$25,000 (CDBG)

Child Health Services - Pediatric Clinic - \$65,000 (CDBG)

Manchester Community Resource Center Employment Training Programming - \$80,000 (CDBG), \$18,000 (AHT)

Planning and Community Development Department Housing Initiatives - \$406,416 (HOME), \$75,000 (AHT)

Manchester HOME/CHDO Projects - \$79,750 (HOME)

The City addressing issues of homelessness and homeownership through its homeless and housing strategies respectively will complement supportive Services. The City is also coordinating these efforts as part of an overall strategy, including economic development projects for the retention and creation of jobs.

In addition to housing and economic development programs, other activities such as infrastructure repairs and maintenance and crime patrols will be included as part of the City's strategy to assist those in economically distressed neighborhoods. The key strategies of the Community Improvement Program include efforts to improve the lives of the City's poorest residents. The strategies will focus on sustained economic development, job creation, job training and education, improved social and other support.

Institutional Structure

The institutional structure for housing in Manchester, other than those of the CIP staff and two local nonprofit housing providers, primarily involves Manchester Housing and Redevelopment Authority (MHRA).

MHRA was established by state statute as the local housing authority and the redevelopment agency for the City. Five commissioners who are appointed for staggered five-year terms by the Mayor govern the Authority. MHRA owns and manages 1,271 units of family and elderly housing in various sites throughout the City. It also administers 1,813 units of rental assistance under its Housing Choice Voucher (HCV) Program, 104 VASH vouchers, 100 Vouchers for Non-Elderly Persons with Disabilities and assists 23 additional households through the MOD/SRO Program.

MHRA's Youth and Family Services staff provides organized educational and recreational activities for low-income youth primarily in public housing. The program serves approximately 200 youth ages 3-18 annually. In addition, MHRA partners with a private contractor to provide day care and preschool as well as a summer day camp.

The Manchester School Department operates the Selma Deitch Early Learning Program at the Bishop Leo E. O'Neil Youth Center providing preschool activities for 3 and 4 year olds which introduces children to school activities two years prior to entering kindergarten. MHRA residents are given a preference in placement in this program in return for the provision of space to hold classes at no cost to the school district.

MHRA's Elderly Services staff provides its Supportive Service Program to elderly and persons with disabilities living in its Low Income Housing Tax Credit properties: Mary Gale Apartments, Brown School Apartments and Laurette Sweeney Apartments. This program provides one meal per day, service coordination, socialization activities, and, as needed, such services as transportation, housekeeping, personal care, etc.

In its Family Self-Sufficiency Program, MHRA works with HCV households to achieve economic independence and to facilitate access to supportive services that include childcare, transportation, self-employment training and personal career development.

MHRA's Homeownership program allows eligible Housing Choice Voucher residents to use their assistance toward the purchase of a home in MHRA's jurisdiction. Families who participate in this program must be first-time homebuyers and must attend and complete a homeownership and housing counseling program. Successful residents may use their HCV toward payment of the mortgage for up to 15 years, depending on the term of the original mortgage. Since the beginning of the program 33 families have participated. At present, there are 23 participating families.

Addressing Obstacles to Meeting Under Served Needs

Once again, this is an area where the continued efforts of the Community Improvement Program and the human service agencies are coordinating resources to respond to the housing and service

needs of disabled populations. The obstacles in this area are similar to those identified in the other priorities, i.e. avoiding the concentration of housing for this population in any one area, but instead, assessing housing needs and resources on a citywide basis; assuring that housing location and access to services are considered and addressed in any undertaking; working with non-profit agencies dealing with persons with disabilities to build awareness of needs and encouraging the community to accept what some may view as nontraditional housing.

Additional discussion for addressing obstacles to meet under served needs is provided in the following sections “Removing Barriers to Services”, “Removing Barriers to Affordable Housing” and the “Anti-Poverty Strategy”.

Coordination Between Agencies

The coordination of efforts between MHRA, which administers local housing resources, local non-profits such as NGM, The Way Home, Families In Transition, Helping Hands and New Horizons along with other service providers in the community is emphasized. Representatives of the organizations mentioned above are also active in the Greater Manchester Association of Social Service Agencies, the Continuum of Care and other coalitions.

MHRA is active in coordinating with a number of partner agencies to provide programs to assist low-income families to become economically self-sufficient. Programs mobilize a wide array of area resources to remove barriers to economic self-sufficiency for public housing residents. In concert with its partner agencies, MHRA promotes school to work and welfare to work training and transition.

The Manchester Area Continuum of Care Coordinating Council (MAC4) exists to promote coordination between Manchester's homeless service providers and other community leaders in the ongoing development of a comprehensive system of care. MAC4 will help in the coordination and use of community resources to prevent homelessness by helping families and individuals move from homelessness to successful placement in permanent housing.

Objectives

The following is a list of the objectives of the Continuum of Care Council:

- Housing and service needs of the homeless and those at risk of being homeless are identified with information from homeless and at risk individuals and the people working with them. Information and needs identified through this process are included in a community – wide needs assessments and planning process.
- Issues concerning the effective development and achievement of the Manchester Area Continuum of Care are brought before the Low-Income Housing Network, Greater Manchester Association of Social Agencies, Recommendation Committee for Elderly Services and other community groups.
- Housing and service providers will work together to reduce service barriers, maximize effectiveness of existing services and identify any gaps in the service continuum that could be addressed by existing programs or through the creation of new programs.
- An up-to-date, comprehensive housing and service resource information and referral clearinghouse is developed and maintained.

The Community Improvement Program Staff of the City interacts with these agencies and other providers such as the New Hampshire Housing Finance Authority and Mental Health Center of Greater Manchester. In addition to these efforts, the implementation of the Manchester Community Resource Center where residents can receive information and referral to

employment, education and social service programs is another example of the coordination between agencies. This coordination among agencies to carry out family support programs, such as parenting skills and family counseling, domestic violence and substance abuse prevention/intervention, daycare, teen pregnancy prevention and food and nutrition will work to strengthen the efficiency and delivery of services.

The City, through the Community Improvement Program, will continue to consult with housing and service providers regarding programmatic and funding needs and how to improve programs supported by City resources in addition to other sources.

PUBLIC COMMENTS ON THE ACTION PLAN

Several written comments on the Action Plan were received and they have been included as a part of this document. In addition, attendees at the public meetings held on December 14, 2012, December 15, 2012, April 2, 2012 and April 19, 2012 made considerable verbal comments. At each Public Hearing a handout detailing the sources and the distribution of Federal funding received from the U.S. Department of Housing and Urban Development was provided to the citizens in attendance. A copy of the document has been provided as a part of the record.

January 12, 2011 – Public Hearing

Samuel Maranto (City of Manchester) - Samuel Maranto introduced himself as the CIP manager. He is responsible for overseeing the expenditure of the Federal funds that the City receives from the US Dept. of Housing and Urban Development (HUD). A requirement of the City receiving those funds is the need for a public hearing. We are required to take into consideration the comments of the public and the way our funds will be spent must be in tandem with each other. Unfortunately, the requests for funding received by the City far outweigh the available funds. The City is also anticipating a reduction in funding for the upcoming year. Mr. Maranto continued to explain eligible expenses and uses of CDBG, ESGP, and HOME funds. CDBG funds are spent on the high percentage of low/moderate income persons living in the City. The data we are using to determine this population is dated, but it shows 52% of the City to be low/mod income and it is expected to increase with new data. CDBG eligible expenses are broadly inclusive and include many activities such as: public services, social services, youth, roads, parks, etc. The funding trend the City has followed over the past several years is funding an increasing amount of public services vs. public facilities. Public services are provided by approximately 35 agencies within the City. This distribution has been made based on the funding choices of the Board of Mayor and Aldermen to address the highest needs within the City. HUD funds for FY2011 were used for: community management, community development, Weed 'n Seed Program, and a decreasing need for recreation and leisure. The City rehabbed many of its inner-city parks over the last several years and now they only require minimal amounts to maintain them. Mr. Maranto also informed the public we would be preparing our annual CAPER report during June and July to summarize how the money from the current year was spent and the outcomes of that funding. In addition to the CDBG, ESGP, and HOME funds, the City is also expecting to receive 3rd Round NSP funds. Currently, the City has received \$8 million and the State has received \$17 million through the NSP program. A notice of the additional funds is expected to come in March. In closing, Mr. Maranto invited verbal comments (listed below) and also solicited written comments as well.

Sara Jane Kway (Granite State Organization Project) – Ms. Kway explained that the Granite State Organization Project works with faith based community organizations and have not had to take Government funds to follow their mission. Ms. Kway was lobbying for New American Africans as she believes an organization that works to assist the refugee population and is run by a former refugee will be more effective because they are connected to the clients. She sees the incredible need for this service within the City. Ms. Kway also complimented the City for the success of the Homeless Services Center.

Samuel Maranto (City of Manchester) - Mr. Maranto clarified the request by explaining that CDBG funds can not be committed to target a certain ethnic group, but we are trying to open up room for other social service agencies.

Sue Howland (Granite United Way) – Ms. Howland reminded the public of the 10 Year Plan to End Homelessness, which we are diligently following. Ms. Howland did express concern about the rapidly approaching termination date for ARRA funding (FY2012). Families in Transition and Veterans housing organizations are important and she would like to see them continue their priority status.

Kathy Vachon (CASA) – Kathy Vachon stated that the money CASA receives is used to fund part of a staff position to advocate for abused and neglected children. CASA is able to advocate for more than 100 children per day in Manchester alone. They served 173 children in 2010 and 135 in 2011. The goal is for volunteers to make recommendations to the court, give the children a voice, and advocate for what is the best for the child (not state or parents). Ms. Vachon was requesting funding to continue the advocacy for Manchester children.

Honore Morenzi (New American Africans) – Mr. Morenzi wants to have more done for immigrants entering the education system. Mr. Morenzi has witnessed immigrant children being placed in the public school system according to their age and not their knowledge level. The gap seems to be in the assimilation process and he is asking for additional funding to be put into this area and asked what else the City could do. Another issue that Mr. Morenzi brought up was dealing with cultural differences within schools. The example given was about cultural differences creating a problem between students.

Samuel Maranto (City of Manchester) - Mr. Maranto informed Mr. Morenzi that the City's CIP cannot address these types of issues. It is the school system that has to have an intake process to address these issues. It was recommended to Mr. Morenzi that he approach the Mayor and local Aldermen to address the issue with the school system.

Florentina Dinu (Southern NH Area Health Education Center) – The agency teaches new American refugees and immigrants to become interpreters. SNHAHEC has been trying to find funding for several years to develop an after school program to orient new students by allowing them to show pride in their ethnicity and how to properly behave in the US school system. A possible source of funding for this project to be obtained from Department of Health and Human Services as a way to help minorities that will result in future jobs. CIP funding would be used to leverage these funds. Ms. Dinu described herself as a former Refugee which has helped her to understand the struggles of this population. Ms. Dinu was gracious for the funding SNHAHEC has received over the last 6 years and admitted the program would not survive without the funding.

Jeanine Tousignant (Manchester Community Music School) – The Manchester Community Music School is seeking funding to offer as financial aid for low income children. The scholarship would allow low income children to participate in after school music programs. Ms. Tousignant explained music has been found to be a universal language and it has been successful in creating stronger family units. Music is considered a source of comfort to abused and neglected children, an outlet for emotions, and teaches team building and creativity, and provides children with an additional mentor. Many of the kids that benefit from the services offered by the Music School claim they go to school just to get to the Music school after they have completed their school day. The program fits into health and human services and education as well as many other categories that effect a child's life.

Jawad Ashour (City Year) – Mr. Ashour spoke in support of the Bishop O’Neil Community Center. He has been exposed to the youth recreation program run by MHRA and feels it is very useful to the students. They teach parents how to write, obtain necessary services as well as operate family understanding nights. The programs that support education for young people and adults are amazing. Mr. Ashour believes education is the root of a lot of issues and more programs are needed to teach basic skills that will allow new citizens to navigate social service systems effectively. Education makes the system run better.

Moshe Lovi (City Year) -BRING IT – Mr. Lovi spoke in support of the Bring It Program. He described the program as an after school program that brings together multi cultural students to play games, offer homework help, etc. The program creates an environment that fosters learning. Mr. Lovi was very impressed with the program and offered his support for its importance.

Maria Gagnon (Child Advocacy Center of Hillsborough) – Ms. Gagnon stated that her organization is new to Manchester and this is their first time applying for CIP money. The organization supports children through the child abuse and crime witness processes. Many crimes are witnessed by children. The Child Advocacy Center of Hillsborough provides a safe, friendly place to conduct forensic interviews while offering support to children with the services they need. Last year the organization served 600 children countywide, of which 221 were Manchester residents and of the 221, 78% were low income.

Samuel Maranto (City of Manchester) - Mr. Maranto explained the challenge involved in funding agencies. It is difficult to make room for new agencies without cutting out older ones. He explained the great need to create economies of scale, collaboration, etc. This has been the driving factor behind the creation of the Odd Fellows building which will offer office space for a few non profits and a community meeting space. Mr. Maranto advised the participants that they could contact the Mayor and the Aldermen to gain support for their organization. He noted that Congress was trying to cut \$1.3 million from the City’s annual entitlement award so it was extremely important that the agencies and public contact their Congressman and City officials to lobby for their agency and interests.

January 19, 2011 – Public Hearing

Samuel Maranto (City of Manchester) - Samuel Maranto introduced himself as the CIP manager. He is responsible for overseeing the expenditure of the Federal funds that the City receives from the US Dept. of Housing and Urban Development. A requirement of the City receiving those funds is the need for a public hearing. We are required to take into consideration the comments of the public and the way our funds will be spent must be in tandem with each other. Unfortunately, the requests for funding received by the City far outweigh the available funds. The City is also anticipating a reduction in funding for the upcoming year. Mr. Maranto continued to explain eligible expenses and uses of CDBG, ESGP, and HOME funds. CDBG funds are spent on the high percentage of low/moderate income persons living in the City. The data we are using to determine this population is dated, but the most recent estimate shows 52% of the City to be low/mod income and it is expected to increase with new data. CDBG eligible expenses are broadly inclusive and include some activities such as: public services, social services, youth, roads, parks, etc. The funding trend the City has followed over the past several years is funding an increasing amount on public services vs. public facilities. Public services are provided by approximately 35 agencies within the City. This distribution has been made based

on the funding choices of the Board of Mayor and Aldermen to address the highest needs within the City. HUD funds for FY2011 were used for: community management, community development, Weed 'n Seed Program, and a decreasing need for recreation and leisure. The City rehabbed many of its inner-city parks over the last several years and now they only require minimal amounts to maintain them. Mr. Maranto also informed the public we would be preparing annual CAPER report during June and July to summarize how the money from the current year was spent and the outcomes of that funding. In addition to the CDBG, ESGP, and HOME funds the City is also expecting to receive 3rd Round NSP funds. Currently, the City has received \$8 million and the State has received \$17 million through the NSP program. A notice of the additional funds is expected to come in March. In closing, Mr. Maranto invited verbal comments (listed below) and also solicited written comments as well.

Denise Rivard (*Private Citizen*) – Ms. Rivard spoke in support of the benefits of the Home Health and Hospice program. Ms. Rivard told her personal stories of how Home Health and Hospice was able to keep her family members living in their own homes, independently with minimal assistance. This alleviated the need to place the family members into a nursing home.

Jackie Collins-Riddick (*Private Citizen*) – Jackie Collins-Riddick advocated for the continuation of The Way Home's rental assistance program which she was a direct beneficiary. Ms. Riddick also urged for support services for those citizens diagnosed with health conditions and needing assistance with the barriers for treatment (i.e.: rides to appointments).

Dick Webster (*Manchester Housing Redevelopment Authority*) – Mr. Webster spoke about MHRA's target audience being the elderly and disabled in need of supportive services to live independently. The current project to serve this population is the South Porter Street housing project that has recently completed phase 1 yielding 31 units and beginning phase 2 to build an additional 30 units. The residents of these units will receive the supportive services they require to maintain their living independence. Mr. Webster discussed the criteria for residents in the units as being: elderly or disabled, low income, and having completed the MHRA homeless evaluation.

Cynthia Andreola (*Harbor Homes*) – Ms. Andreola spoke in support of the Somerville St. Veterans Housing project that will provide 26 housing units for honorably discharged veterans. This is the first project Harbor Homes has undertaken in Manchester as its operation resides in Nashua. Harbor Homes has created 136 units of housing in Nashua for this population. Harbor Homes is anticipating taking over the building in the near future and begin work in the spring or summer and fill in vacancies with residents at the beginning of 2012.

Kevin Kintner (*New Horizons for NH*) – Mr. Kintner discussed the importance of the shelter in assisting clients of The Way Home, Manchester Emergency Housing, veterans housing, etc. starting their journey back into self sufficiency. The shelter is able to provide a warm place for their clientele to go and eat a hot meal. The shelter has recently performed major energy efficiency upgrades to the building which has assisted them in lowering utility costs and stretching their funding further.

Monika Bryant (*Manchester Housing Redevelopment Authority*) – Ms. Bryant urged for additional resources on behalf of the Continuum of Care for Homelessness. The plea was to provide more funding to create educational resources for the homeless as opposed to stop-over places for them to sleep and eat. Ms. Bryant believes the services are there, but they need to be advertised more. Ms. Bryant also complimented the City on the creation of the Homeless Day Services Center.

Jen Indeglia (*Girls Inc.*) – Ms. Indeglia spoke in support of and seeking funding for the two programs: Girls Center and Café Lauren. About 100 very low to moderately low income girls a day utilize their Varney St. facility. The program offers tuition assistance for all families so no girl is turned away due to inability to pay. The Café Lauren program provides dinner every night to approximately 40 girls and their families for no fee. The quantity of meals served has been increasing so the need is apparent. The program provides families with the opportunity to sit down together for a family meal.

Greta Casanave (*Big Brothers Big Sisters of Greater Manchester*) – The program services Greater Manchester youth and provides them with a mentor that is professionally trained and also works with the parents on their own mentoring skills. The relationship is monitored for effectiveness and also tries to assist the family through referrals to various services offered within the City. The mentoring program has been fully evaluated showing positive results for enrollees as far as: staying in school, resisting drugs and alcohol, and improvement to overall quality of life.

Rick Castillo (*The Way Home*) – Mr. Castillo requested increased attention and funding to the educational component of housing counseling. Education in financial fitness strategies including expense prioritizing and budgeting would help clients to be less at risk for homelessness. Due to high demand and insufficient staffing, the educational component comes too late and the seriousness of their situation has elevated to requiring assistance through relocation or other programs. Mr. Castillo also spoke in favor of social service collaboration to share information and spread the word about services being offered.

Meghan Brady (*St. Josephs Community Services*) – Ms. Brady stated that St. Josephs Community Services provides nutritional meals and safety checks for their clients enabling them to stay in their home longer. Ms. Brady recognized the demand for her organization's services is high. Unstable economic times are taking a toll on this population and it is impacting the request for meals.

Cathy Chesley (*Catholic Charities*) – Ms. Chesley is requesting funding for an Arts program to benefit low income youth that have shown an aptitude for art, but have no resources to pursue it. Statistics have shown that participation in the arts benefit the children emotionally, academically, and socially.

Pamela Brown (*Granite Pathways*) – Ms. Brown advocated for the use of her self-help program to benefit the mentally disabled. She explained the importance of their accepting and nurturing environment in trying to achieve the goals of the program and welcomed their services to be utilized by local non profits.

Renie Denton (*Manchester Community Resource Center*) – Ms. Denton advocated for the workforce development program and job resources that are provided to low and moderate income individuals through the Resource Center. She explained the workforce development program as employing the individuals that are least luckily to be hired. These programs provide individuals with the job training skills and resources required for future employment. The Resource Center also provides services for the low income including: community resources, job book, computers, email, certification classes and programs, telephones, and copy/fax machines.

Izet Hamidovic (*The Way Home*) – Mr. Hamidovic echoed the thoughts that the homeless population is increasing rapidly and the need for additional funding is apparent. Permanent supportive housing is another area that the City needs to look into developing to assist those that just can't possibly become completely self-sufficient. A separate issue, lead paint, is becoming a large problem because of the refugee population.

Samuel Maranto (City of Manchester) - Mr. Maranto explained the challenge involved in funding agencies. It is difficult to make room for new agencies without cutting out older ones. He explained the great need to create economies, collaboration, etc. This has been the driving factor behind the rehabilitation of the Odd Fellows building which will offer office space for several non profits and a community meeting space. Mr. Maranto advised the participants that they could contact the Mayor and the Aldermen to gain support for their organization. He noted that Congress was trying to cut \$1.3 million from the City's award, and thus it was extremely important that the agencies and public contact their Congressman and City officials to advocate for their Agency and interests.

April 6, 2011 – Public Hearing – Minutes available at the City Clerks Office.

**City of Manchester
2012 Annual Action Plan
HUD Citizen Participation
Program Overview**

The City of Manchester is conducting public informational meetings to solicit citizen comments on the planned expenditure of approximately \$2,258,734 of grant funds to be received in 2012 from the United States Department of Housing and Urban Development (HUD). These meetings are being held in order to provide City residents an opportunity to comment on the planned expenditure of the FY 2012 HUD monies to be allocated in the City's 2013 Community Improvement Program (CIP). These funds will be programmed for expenditure as a part of the City's fiscal year 2013 Community Improvement Program Budget effective July 1, 2012.

It is anticipated that the City will receive funding from HUD for three specific Programs, the Community Development Block Grant Program (CDBG), the Home Investment Partnerships Program (HOME) and the Emergency Solutions Grant Program (ESGP). Given the significant changes to the make up of Congress the exact appropriation for these various programs are not known at this time. Inasmuch we have projected level funding for FY2013. For HUD FY 2012 it is estimated that Manchester will receive the following approximate appropriations:

| | | |
|----|--------|-------------|
| 1. | CDBG - | \$1,599,793 |
| 2. | HOME - | \$531,641 |
| 3. | ESGP - | \$127,300 |

In addition to the annual HUD appropriation, the City anticipates accessing and utilizing funding from the sources detailed below:

| | | |
|----|--|--------------|
| 1. | Section 108 - | \$4,000,000* |
| 2. | Neighborhood Stabilization Program 3 - | \$1,000,000 |
| 3. | Lead Hazard Reduction Demonstration - | \$3,967,678 |

* (Section 108 allocation based upon 2009 application for funding)

Programs and projects to be funded with HUD monies as a part of the 2013 CIP will be consistent with the goals and objectives of the 2010 – 2015 Consolidated Plan and also identified in the City's 2012 Annual Action Plan.

A description of each program and eligible activities follows:

CDBG – CDBG funds may be used to carry out a wide range of community development activities directed toward revitalizing neighborhoods, economic development and providing improved community facilities and public services. All CDBG activities must primarily benefit low and moderate-income persons or aid in the prevention of slums and blight. CDBG funds may be used for activities, which include, but are not limited to the following:

- Acquisition of real property.
- Relocation or demolition.
- Construction of public facilities and improvements such as water and sewer facilities, streets, parks, neighborhood centers and the conversion of schools for eligible purposes.
- Public services, within certain limits.
- Rehabilitation of housing.
- Provision of assistance to profit motivated businesses to carry out economic development and job creation/retention activities.
- Job training and skill development for low and moderate-income individuals.
- Removal of architectural barriers to the disabled.
- General Neighborhood Revitalization

HOME – The HOME program helps to expand the supply of decent affordable housing for low and very low-income families. HOME funds may be used for activities that include, but are not limited to the following:

- Provision of incentives to develop and support affordable rental housing and homeownership affordability through the acquisition, new construction, reconstruction, or rehabilitation of non-luxury housing with suitable amenities.
- Provision of tenant-based rental assistance, including security deposits.
- Provision of reasonable administrative and planning costs.
- Provision of the operating expenses of community housing development organizations.

ESGP – The ESGP provides funding for five eligible components, including street outreach, emergency shelter, homeless prevention, rapid re-housing and the Homeless Management Information System (HMIS). It also funds the rehabilitation or conversion of buildings into homeless shelters, and administrative costs. ESG funds may be used for activities that include, but are not limited to the following:

- Street outreach case management, engagement, emergency health/mental health services, transportation and services to special populations.
- Emergency shelter essential services such as case management, child care, health/mental health services, employment assistance/job training, legal services; shelter operating expenses; and the conversion, major rehabilitation, or renovations to buildings as emergency shelters.

- Rapid re-housing and homelessness prevention activities such as short-and medium term rental assistance and housing relocation and stabilization services including financial assistance, housing search and placement and case management.

Section 108 – This program is the loan guarantee provision of the CDBG program with a focus on the creation or retention of jobs. Section 108 provides financing for economic development, public facilities and large-scale development projects. Section 108 funds may be used for activities, which include, but are not limited to the following:

- Economic development activities eligible under CDBG.
- Acquisition of real property.
- Rehabilitation of publicly owned real property.
- Construction, reconstruction, or installation of public facilities.
- Related relocation, clearance and site improvements.
- Payment of interest on the guaranteed loan and issuance costs of public offerings.
- Debt service reserves.

HUD funds may be used to finance a wide range of programs and projects not normally provided for through the City's property tax revenue derived City Budget. Past activities have included affordable housing development, home ownership assistance, major infrastructure and public facility improvements such as reconstruction of streets, sidewalks and parks as well as the renovation of commercial properties. In addition, HUD funds have been used to provide needed public services including but not limited to: health care, day care, homelessness prevention, youth recreation and job training. The attached pie charts on the following pages describe how the HUD funds were distributed in the last fiscal year.

As a part of the City's development of the 2013 CIP budget, requests from City Departments and various community agencies and organizations have been recently received and are in the process of being reviewed for funding. This public informational meeting serves as an opportunity for the receipt of public input on the manner in which these funds will be allocated. Questions and comments on the status of the City's past and ongoing HUD programs may also be received and discussed. Therefore, Manchester Citizens are encouraged to present their comments or concerns at tonight's meeting or may submit written comments to the City Planning Department located at One City Hall Plaza.

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LEGAL NOTICE
(HUD FY 2012 Annual Action Plan)

Notice is hereby given that as part of the development process of the City's 2013 Community Improvement Program, the City of Manchester Planning & Community Development has prepared the a draft of the City's Annual Action Plan for federal fiscal year 2012. The Action Plan is an annual element of the five-year Consolidated Plan, which is a prerequisite for the receipt of funding from the US Department of Housing & Urban Development (HUD), including Community Development Block Grant (CDBG), Emergency Solutions Grant Program (ESGP), HOME and Section 108 Funding. The estimated level of funding for each is as follows: a CDBG Entitlement of \$1,595,621 with an additional \$73,152 of projected program income/unprogrammed funds; HOME funds in the amount of \$535,754 with an additional \$70,912 of projected program income/unprogrammed funds; Emergency Solutions Grant Program Funds in the amount of \$149,692; and Section 108 Loan Funds of \$4,000,000 for a total of \$6,425,131.

Submittal of the Action Plan to HUD will occur upon approval by the Board of Mayor and Aldermen, after June 5, 2012.

The Action Plan includes a number of activities that will primarily benefit low and moderate income City residents, either directly or indirectly. In accordance with HUD requirements a minimum of 70% of the beneficiaries of the programs and activities will be low and moderate income individuals.

Proposed activities encompass (1) Public Services Activities which include day care, health, youth, after school and in school alternative educational and recreational programs, social services and neighborhood safety oriented programs; (2) Homeless Prevention and Homeless Support Services; 3) General Municipal and Community Development Programs including neighborhood and housing revitalization, infrastructure improvements, lead paint hazard remediation,; and (4) Planning and Administration to include administrative costs for overall program activities and contingencies.

Copies of the draft Action Plan will be available for public inspection beginning on April 23, 2012 at the following locations during regular business hours:

Planning and Community Development Department, One City Hall Plaza, Manchester, NH;
Manchester City Library, 405 Pine Street, Manchester, NH;
West Side Library, 76 Main Street, Manchester, NH

Questions regarding the Action Plan may be addressed to CIP Manager Sam Maranto in the Planning and Community Development Department at 624-6530.

The public is encouraged to submit comments on the proposed Action Plan until May 23, 2012. Please submit written comments to the City of Manchester Department of Planning and Community Development, One City Hall Plaza, Manchester, NH 03101.

Signed: Leon L. LaFreniere, AICP
Director of Planning and Community Development

LEGAL NOTICE
(HUD Citizen Participation Meetings)

The City of Manchester Community Improvement Program Staff will be conducting a public hearing on the City's proposed FY2013 Community Improvement Program (CIP) which includes funds allocated through the US Department of Housing and Urban Development, (US-HUD). The hearing will be held on Thursday, April 19, 2012 at 7:00PM at the Manchester Community Resource Center located at 177 Lake Avenue Manchester. This meeting is being held in order to provide City residents an opportunity to comment on the planned expenditure of Federal Fiscal Year 2012 HUD monies to be received by the City in July 2012. These HUD funds will include Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), Emergency Solutions Grant Program (ESGP) and may also include HUD Section 108 Monies.

Manchester Citizens, including public housing residents, public and private agencies, businesses and other interested parties are invited and encouraged to attend. The topics to be discussed may include housing, public infrastructure, environment, neighborhood investment & revitalization, education, public safety, recreation, economic development and the provision of social services.

The comments received at this meeting will assist CIP Staff in the development of the Annual Action Plan, an element of the five-year Consolidated Plan. The Action Plan and Public Hearing are mandated by the US Department of Housing and Urban Development as a condition of the receipt of funds from that Agency.

For further information, please contact CIP Program Manager Sam Maranto at the Manchester Planning and Community Development Department at 624-6530. Individuals requiring special accommodations for access to the hearings are requested to contact this Department at the above number at least 72 hours prior to the hearing.

Signed: Leon L. LaFreniere, AICP
Director of Planning & Community Development

(UL-4/6)

Monitoring Standards & Procedures

In 1975 the City of Manchester created the Community Improvement Program as a formal mechanism to deal with the receipt of various types of Federal and State grants and programs.

The Community Improvement Program budget integrates the planning and policy considerations of a capital improvement budget with other community needs. Since its inception, the City, through CIP, has applied for and received several major grants both on an entitlement basis and through various competitive processes.

The City has demonstrated a capacity for administering all grants received, either directly or through a designated operating agency. In all cases of project implementation, the operating agency is provided with guidelines that must be followed and that cover all aspects of the project.

All applications for CDBG, HOME and ESGP monies shall be monitored for compliance with the strategy of the Consolidated Plan and all applicable Federal, State and local laws and regulations. Compliance with the Consolidated Plan shall be a threshold criterion for all applications. Certificates of consistency with this plan will be only issued after a review of each proposed project has been completed.

In order to ensure compliance by the operating agency, the City Planning Department Community Improvement Program Staff uses its comprehensive project monitoring system to physically monitor construction activities. Through site visits and project progress reports, the CIP staff strives to ensure that all applicable regulations and procedures are complied with by the administering agency/department. A systematic monitoring of the projects further serves to assist the departments and administering agencies through an identification of problems and potential delays, and in the realization of the expected impact of their project within the schedules established at project inception. All HUD funded project Subrecipients shall be monitored a minimum of one time annually.

Grant funds will be requisitioned by the City in a manner designed to meet current cash needs only. It is the City's intent to continue to request a drawdown on the established Letter of Credit on a monthly basis in an amount necessary to reimburse subrecipients for work that is performed and has been verified by both our financial /monitoring staff.

All financial management systems shall be subject to rigorous accounting procedures including an annual audit in the case of CDBG, ESGP and HOME funds and periodic single program audits as currently required by Federal government regulations.

The CIP staff can audit and/or evaluate any CIP program or project if it is deemed necessary by the staff. All records, contracts, invoices and other pertinent material concerning the program or project are subject to on site review and scrutiny.

When the administrators of CIP are audited by outside entities on CIP programs or projects, the administering department or agency is required per contractual agreements to provide supportive information to satisfy these outside requests.

All CIP program and project files must record any evaluation or audit conducted by outside auditors. The evaluation and its outcome must be included in the office file.

The CIP staff's auditing team consists of two Senior Planners, a Planner II and a Planner I who divide the review of projects by certain "areas" as contained in the CIP plan. These areas are: social services; education; public safety; parks and recreation; leisure; housing and community development; transportation; environment and infrastructure; and community management. A variety of funding sources are present in each area and the staff allocate their time depending on the level of accountability required by each funding source.

Monitoring is viewed by the CIP staff as an opportunity to further develop a partnership with the subrecipient or developer. The staff use these visits to discover if there are any phases of the program design that need to be revised. Such visits also offer the chance to lend technical assistance when needed and to further build the capacity of these entities.

Subrecipients and developers are judged on established performance measures that are laid out between the City and these entities through written agreements that establish clear performance milestones. The performance standards define: (1) how progress will be measured; (2) how accomplishments will be rewarded, e.g. continued or expanded funding for the activity, etc.; and (3) how sanctions may be imposed if necessary.

Monitoring is a continuing opportunity to modify and improve the quality of the service delivery system. When warranted, CIP staff establish periodic meetings to evaluate the progress of subrecipients and developers particularly when they undertake new programs and projects on behalf of the City.

Although the CIP program does not have a formal monitoring plan adopted, the collective experience of the staff provides a wealth of knowledge in the area of monitoring. The techniques for monitoring subrecipients are gleaned from hands on experience in the field with a variety of providers. Monitoring visits will be conducted annually and this does not take into account the ongoing meetings with providers to offer technical assistance and input. Interaction of staff with these same providers on a monthly basis as members of various community groups and committees also serves to reinforce our knowledge of their activities.

The CIP staff emphasizes monitoring the new subrecipients who may be unfamiliar with the reporting requirements. These subrecipients ultimately require much more technical assistance due to their unfamiliarity with the system and the unique federal requirements.

Long Term Compliance

In order to ensure the long term compliance of existing and future housing projects that develop within the next twelve months, the City will rely on the staffs knowledge of the requirements associated with the HOME program so that projects funded directly with City grant monies are viable. Three methods will be used to ensure compliance. They are:

- * Use of a written Subrecipient Agreement executed between the City and other entities;
- * Monitoring of projects by CIP staff;
- * Detailed recordkeeping on a program and project basis.

The Subrecipient Agreement executed between the City and its participating entities will serve as the benchmark for judging all future actions of that entity. Such an agreement will remain in effect for the period of affordability as determined by the amount of funds placed in each project.

As was previously mentioned, at least annually if not semi-annually, the City will monitor the performance of each subrecipient that administers or receives HOME, ESGP, CDBG, etc., funds. In terms of rental housing projects, the City will:

- * Recertify tenant income;
- * Review rent and utility allowances;
- * Conduct on site inspections for compliance with Section 8 Housing Quality Standards (HQS):
 - annually for projects of more than four units;
 - once every two years for projects with 1 to 4 units.
- * Review of the project owner's compliance with written agreements.

Many of these same procedures are being done by the CIP staff as per the terms of the agreements for the use of Housing Development Action Grant (HODAG) funds. During the late 1980's the City through a private developer and the local housing authority was able to successfully compete for these monies, and two projects were built. The long term monitoring requirements are a inherent function of the CIP office, and such reviews of tenant documentation are conducted on an annual basis.

All subrecipients through the written agreement are required to keep their internal project records for a period of Four years. The CIP office also retains project records for a period of four years. Where a period of affordability applies, subrecipients and developers are required to retain the records for three years after the affordability period ends.

Records covering displacement and acquisition are also required to be retained for three years after the date persons who are displaced or three years from when the final acquisition payment is received, whichever is later.

The City of Manchester is an entitlement City and has used a substantial amount of its CDBG grant to fund housing rehabilitation programs. With the inception of Community Improvement Program (CIP) in 1975, the City of Manchester created a formal mechanism for dealing with the various types of federal and state grants. The CIP budget integrates the planning and policy considerations of a capital improvement budget with other community needs. Since 1975, the City, through CIP, has applied for and received several major grants both on an entitlement basis and through various competitive processes.

The City has demonstrated a capacity for administering all grants received, either directly or through a designated operating agency. In all cases of project implementation, the operating agency is provided with a list of guidelines that must be followed and that cover all aspects of the project.

All applications for CDBG, HOME and ESGP monies are monitored for compliance with the Consolidated Plan and all applicable federal, state and local laws and regulations. Compliance with the Consolidated Plan shall be a threshold criterion for all applications. Certificates of consistency with the Consolidated Plan will only be issued after vigorous review.

In order to ensure compliance by the operating agency, the CIP office will use its comprehensive project monitoring system to physically monitor construction activity. Through site visits and project progress reports, CIP staff will ensure that the administering agency/ department complies with all applicable regulations and procedures. The systematic monitoring of the projects further serves to assist the departments, through identification of problems and potential delays, in realizing the expected impact of the project within the schedules established at project inception.

Grant funds will be requisitioned by the City in a manner designed to meet current cash needs only. It is our intent to request a drawdown on the established Letter of Credit on a monthly basis to reimburse Subrecipient for work performed and verified by both our financial and monitoring staff.

All financial management systems shall be subject to rigorous accounting procedures including an annual audit in the case of CDBG, HOME and ESGP funds and periodic single program audits as currently required by federal government regulations.

The CIP staff can audit and/or evaluate any CIP program or project if it is deemed necessary by the staff. All records, contracts, invoices and other pertinent material concerning the program or project is subject to on site scrutiny. When the administrators of CIP are audited by outside entities on CIP programs or projects, the administering department or agency is required to provide supportive information to satisfy these outside requests.

All CIP program and project files must record any evaluation or audit conducted by outside auditors. The evaluation and its outcome must be included in the office file.

Performance Measurement In Accordance With CPD Notice 03-09

As a part of ongoing monitoring of entitlement funded activities, the City of Manchester has always evaluated the performance of City Departments as well as its Subrecipient. The City's existing performance measurement system evaluates compliance with the 2010 – 2015 Consolidated Plan, monitors expenditure rates on a project-by-project basis, evaluates resources leveraged by entitlement funding, measures project outputs in terms of beneficiaries and/or quantity of improved public infrastructure and compares the performance of Subrecipient to the performance of other Subrecipient. In accordance with CPD Notice 03-09, beginning in FY 04-05 the City of Manchester will document the performance of City Departments and Subrecipients by utilizing the Performance Measurement System that is outlined below:

City of Manchester HUD Entitlement Program Performance Measurement System

1. **Project Name –**
2. **CIP # -**
3. **IDIS # -**
4. **Goal - The project or program is consistent with the following Consolidated Plan goal –**
5. **Inputs – Resources dedicated to the Program –**
6. **Activities – What the program does with the inputs to fulfill its mission –**
7. **Outputs**
 - a. **Expected units of accomplishment upon completion of project –**
 - b. **Actual units of accomplishment upon completion of project –**
 - c. **Total per unit cost of accomplishment –**
 - d. **HUD funding per unit cost of accomplishment –**
 - e. **Expected time of performance (months) –**
 - f. **Actual time of performance (months) –**
8. **Outcomes – Describe the benefits that have resulted from the program**

HOME - 24 CFR 92.254 –Qualification As Affordable Housing Homeownership – Recapture Provision

In accordance with 24 CFR 92.254 of the HOME program requirements, the City of Manchester shall impose one of the recapture requirements outlined in 24 CFR 92.254 (a.)(5)(ii)(A)(1-3) (referenced below) or it's own recapture requirement approved by the DHUD, to ensure that the City recoups all or a portion of the HOME assistance to the homebuyers, if the housing does not continue to be the principal residence of the assisted low-income family for the duration of the period of affordability determined by the City of Manchester. At a minimum the affordability period shall meet the requirements referenced in 24 CFR 92.254 (a.)(4) (referenced below). The recapture requirement shall be implemented in the form of a deed restriction that runs with the land for the duration of the affordability period.

24 CFR 92.254 (a.)

4. Periods of affordability. The HOME-assisted housing must meet the affordability requirements for not less than the applicable period specified in the following table, beginning after project completion. The per unit amount of HOME funds and the affordability period that they trigger are described more fully in paragraphs (a)(5)(i) (resale) and (ii) (recapture) of this section.

Minimum period of Homeownership assistance HOME amount per-unit affordability in years

| | |
|----------------------|----------|
| Under \$15,000 | 5 Years |
| \$15,000 to \$40,000 | 10 Years |
| Over \$40,000 | 15 Years |

5. Resale and recapture. To ensure affordability, the participating jurisdiction must impose either resale or recapture requirements, at its option. The participating jurisdiction must establish the resale or recapture requirements that comply with the standards of this section and set forth the requirements in its consolidated plan. HUD must determine that they are appropriate.
 - (ii) (i) Recapture. Recapture provisions must ensure that the participating jurisdiction recoups all or a portion of the HOME assistance to the homebuyers, if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. The participating jurisdiction may structure its recapture provisions based on its program design and market conditions. The period of affordability is based upon the total amount of HOME funds subject to recapture described in paragraph (a)(5)(ii)(A)(5) of this section.

A. The following options for recapture requirements are acceptable to HUD. The participating jurisdiction may adopt, modify or develop its own recapture requirements for HUD approval.

1. Recapture entire amount. The participating jurisdiction may recapture the entire amount of the HOME investment from the homeowner.
2. Reduction during affordability period. The participating jurisdiction may reduce the HOME investment amount to be recaptured on a pro-rata basis for the time the homeowner has owned and occupied the housing measured against the required affordability period.
3. Shared net proceeds. If the net proceeds are not sufficient to recapture the full HOME investment (or a reduced amount as provided for in paragraph (a)(5)(ii)(A)(2) of this section) plus enable the homeowner to recover the amount of the homeowner's down payment and any capital improvement investment made by the owner since purchase, the participating jurisdiction may share the net proceeds. The net proceeds are the sales price minus loan repayment (other than HOME funds) and closing costs. The net proceeds may be divided proportionally as set forth in the following mathematical formulas:

$$\frac{\text{HOME Investment}}{\text{HOME Investment} + \text{Homeowner Investment}} \times \text{Net Proceeds} = \text{HOME amount to be recaptured}$$

$$\frac{\text{Homeowner Investment}}{\text{HOME Investment} + \text{Homeowner Investment}} \times \text{Net Proceeds} = \text{Amount to Homeowner}$$